

The Modern Slavery Act

The 2020 statement from the British Red Cross

The Covid-19 pandemic is affecting communities worldwide, including in areas already impacted by crisis prior to the outbreak. In addition to taking lives, the pandemic has severely impacted the global economy, resulting in loss of livelihoods, changing migration patterns and the disruption of family and social networks.

Covid-19 affects everyone, but the primary and secondary impacts affect different people in different ways, based on pre-existing physiological differences, health conditions, socio-economic inequalities, age, gender and cultural norms. At the British Red Cross we are concerned about how Covid-19 has put more people at risk of being trafficked and exploited, what has happened to people in conditions of exploitation during the pandemic, and how it has impacted recovery among people who have already left exploitation.¹

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. Just over 14,000 regular volunteers and nearly 4,000 staff work together at the British Red Cross to fulfil our vision and mission, both in the UK and overseas. 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 to ensure respect and dignity for all people.

The British Red Cross is a prominent member of the International Red Cross and Red Crescent Movement, with volunteers and staff contributing to initiatives within the International Federation of Red Cross and Red Crescent Societies (IFRC), the International Committee of the Red Cross (ICRC), and 192 Red Cross and Red Crescent member societies. As part of the Movement, the British Red Cross is committed to, and legally bound by, seven fundamental principles² that guide everything we do.

The British Red Cross, like other Red Cross and Red Crescent National Societies³, has a special, officially recognised status and role as an auxiliary to the UK public authorities in the humanitarian field, which applies at all times, both in peace and in war⁴. This means that the British Red Cross has a unique legal status: it is a private organisation with certain recognised public functions; it is neither part of government nor a non-governmental organisation. The auxiliary status and role are a National Society's standing invitation to participate in public humanitarian services; they provide an automatic relationship between a National Society and its government. While it is an auxiliary to

Her Majesty's Government, the British Red Cross is also required to maintain its autonomy so that it can act in accordance with the fundamental principles⁵.

The British Red Cross is also a member of the Disasters Emergency Committee (DEC), an umbrella organisation that brings together 14 leading UK aid charities in times of crisis internationally. With the support of media and corporate partners, the DEC forms a unique collaborative hub that can launch appeals and raise funds, quickly and effectively, to tackle some of the world's most devastating crises.

At the British Red Cross, we are committed to preventing modern slavery and human trafficking in our supply chains, and our vision for our continuous improvement plan is to eradicate the risk of modern slavery completely in any part of our operations.

We are committed to recognising and responding to trafficking and other forms of modern slavery, not only where we encounter it in our supply chains but also as a key part of our service operations. In recognition of our commitment to supporting people in crisis through our anti-trafficking work, one of the key 2020 delivery pledges in our corporate business plan was to see reduced destitution and distress for displaced people. As part of our commitment to achieving this outcome, we continued to deliver bespoke and enhanced support for people who have been trafficked or subjected to modern slavery. During the pandemic we have adapted this to working remotely, continuing to support trafficked people throughout the Covid-19 response in 2020.

Each year, we support tens of thousands of people through our services across the UK, including over 347 adults and children who have experienced trafficking. We continue to be committed to this pledge and will grow this work

in 2021 across our UK and overseas operations. The objective for our anti-trafficking work is that any adult or child who is trafficked or exploited will be recognised, supported and protected, and that adults are supported to make their own informed safeguarding decisions.

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 2020. Since the last statement, our Modern Slavery in Supply Chains working group has been leading developments across the organisation, and it will continue to do so.

We have set out the work we carried out in 2020 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 builds on our statements from previous years, highlighting new developments and important initiatives we have taken proactively to reduce the likelihood of exploitation, trafficking and other forms of modern slavery from our supply chains and in our organisation, and to

grow our operations to support people who have experienced this heinous crime and abuse.

This statement was approved by the Board of Trustees at its meeting on 13 April 2021.



**David Bernstein CBE, chair, board of trustees
(on behalf of the board)**



Mike Adamson, chief executive officer



**Paul Amadi MBE, chief supporter officer (on behalf
of Britcross Limited, our retail trading arm)**

¹International Federation of Red Cross and Red Crescent Societies, 'COVID-19 Impact on Trafficking in Persons: A Protection, Gender & Inclusion (PGI) Technical Guidance Note'.

See: trafficking-response.org/covid-19

²For more information on our Fundamental Principles please see: www.redcross.org.uk/about-us/what-we-stand-for

³For more information about National Societies, please see: www.redcross.org.uk/about-us/how-we-are-run/the-international-movement

⁴Article 3, The Royal Charter of the British Red Cross Society.

⁵Statutes of the International Red Cross and Red Crescent Movement, Preamble, Principle of Independence.

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Our progress in 2020

In the spirit of continuous improvement, over the past 12 months we have made additional changes which have further strengthened our approach. These developments were communicated to our staff and volunteers on an ongoing basis.

Governance

- We have a British Red Cross code of conduct in place, which applies to all staff and volunteers. It confirms that we will not tolerate exploitation, including sexual exploitation, abuse or violence, and that we have in place processes and systems to report incidents. See under 'Our Policies' below for more details on our 'raising a concern' (whistleblowing) policy and procedure.
- An e-learning module on the code of conduct was launched in 2019 and is mandatory for all staff and volunteers. In 2020, communications initiatives and an organisation-wide drive to improve compliance were put in place to raise training completion rates.
- In 2020, 3,471 of nearly 4,000 staff members, and 2,665 of over 14,000 regular volunteers had completed the training. Completion rates among the organisation's senior leadership were as follows: 100% for the board (12/12), 100% for the executive leadership team (8/8), and 100% for the governance team (6/6). This represents a significant increase in training compliance by staff and volunteers in relation to 2019:
 - In 2020, 87% of all staff were trained in 2020, an increase of 68 percentage points.
 - In 2020, 22% of all volunteers were trained in 2020, an increase of 17 percentage points.
- In 2020, we incorporated the role of the Freedom to Speak Up Guardian (FTSUG) into the Raising a Concern procedure. This offers an independent and impartial source of advice for staff and volunteers who want to speak up, providing an additional option to raise a concern. The aim is to encourage and enable a culture of speaking up throughout the organisation.

Also, in 2020, an internal audit was undertaken on the British Red Cross code of conduct and as a result a series of recommendations for continuous improvements are being rolled out. These include:

- Strengthening training on the code of conduct to add emphasis of our whistleblowing hotline, Safecall. A parallel action has been developed to further promote the use of Safecall as our impartial external reporting line.
- Reviewing the end-to-end cycle of appointing contractors to ensure the code is embedded into all recruitment and onboarding activities.

- Improving our systems for capturing misconduct cases in detail and facilitating accurate reporting to senior management, as well as identifying learnings and implementing actions.

Suppliers and partners

- Our ethical fundraising procedure was used throughout 2020 to screen all significant donations, partnerships, sponsorships and gifts in kind for modern slavery issues.
- Supplier consolidation efforts continued with a total 34% reduction in suppliers from our 2017 figures.
- We moved to a gateway and e-procurement system whereby all suppliers were required to sign the supplier code of conduct before being able to be activated on our procurement system.

Safeguarding

- Due to the Covid-19 pandemic the organisation's work on the Keeping People Safe recommendations and roadmap was paused to ensure urgent operational needs were prioritised and addressed. We remain committed to implementing the recommendations of this review.
- Since January 2019, the British Red Cross has been engaging in the Inter-Agency Misconduct Scheme. This scheme is designed to prevent the movement of perpetrators of sexual exploitation, abuse and harassment (SEAH) from one organisation to another. This process is now live, and has been operating since January 2021. Consequently, we have committed to:
 - while hiring, systematically check with previous employers about any SEAH issues
 - systematically respond to such checks from other organisations
 - monitor data and submit it to the Steering Committee for Humanitarian Response on an annual basis.

Training

- We continued to promote modern slavery-specific training across the organisation. In 2020 146 people were trained in basic awareness, 57 people completed online training in anti-trafficking casework skills and 16 were trained face to face. To enhance the accessibility of this training, it was made available on both the new British Red Cross learning platform and the International Federation of Red Cross and Red Crescent Societies (IFRC) learning platform.
- As part of our response to the additional challenges and risks presented by the Covid-19 pandemic, we led on the development and roll-out of a global e-module on human trafficking, 'Understanding and responding to trafficking in persons'. This was developed in partnership with the Australian Red Cross and the IFRC, and it aims to strengthen the knowledge and capacity of Red Cross and Red Crescent staff and volunteers to recognise and respond to trafficking. The e-module is currently available in English and will soon also be available in French, Spanish, Arabic and Russian.
- We continued to work through the Red Cross and Red Crescent Movement to strengthen our response to trafficking. Due to the challenges presented by the Covid-19 pandemic, we adapted our training to remote learning. We delivered remote training to a number of National Societies, including to colleagues in the Americas as part of a regional capacity-strengthening project.

Anti-trafficking programmes

- Our model of support to survivors of trafficking in the UK moved to remote delivery in March 2020, which enabled us to continue supporting people who were already in the service. The service evolved rapidly to respond to the new needs people were suddenly facing.
- We have worked throughout 2020 to continue strengthening our support to the Red Cross and Red Crescent Movement through the development of global and regional guidance, tools and training materials. We have worked with an increased number of National Societies and continued our engagement with the IFRC, as well as international and national networks and working groups.

Using our voice

- We launched the report ***First steps to safety?***⁶ about our findings on modern slavery reception centres following a police-led operation aimed to disrupt trafficking.
- We worked closely with sector colleagues throughout

2020 to gain clarity on, and advocate about, the rights and entitlements of survivors of trafficking in the UK, specifically in relation to Covid-19 response measures.

Spotlight on our Covid-19 response

From March 2020 we adapted our anti-trafficking work to the remote working context. We continued to offer support to survivors of trafficking within the UK but were required to limit new referrals due to increased operational pressures. Our level of support intensified, as people required additional casework, material items and psychosocial support.

In our international work we adapted our technical advice and support to include considerations around Covid-19. This included the development of technical guidance and a global e-module on understanding and responding to trafficking for Red Cross and Red Crescent Movement staff and volunteers which includes information on the impact of Covid-19 on trafficking.

Our policy work began to focus on the specific needs of people who had been trafficked or were at risk of trafficking as a result of Covid-19. We worked with government in the UK and prepared guidance for our Red Cross colleagues overseas on the key issues we needed to factor into our work and advocacy. This included concerns around how measures to prevent the spread of Covid-19, and the subsequent economic issues that follow, will start to create additional risk factors for people. We were also concerned about the impact of the pandemic on people who were in conditions of exploitation in 2020, and on support for people who had already left exploitation.

Our supply chains had to evolve quickly, owing to the new items we now needed to procure in relation to personal protective equipment (PPE) and other new needs in order to keep our vital services running. We continued to apply our rigorous due diligence procedures throughout 2020, ensuring any new suppliers and third parties met British Red Cross standards.

⁶ British Red Cross (2020), *First Steps to Safety? The role of reception centres in supporting people out of exploitation*. See: redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/human-trafficking-and-slavery/early-support-for-survivors-of-trafficking

Our governance structure

The British Red Cross has its head office in London. In 2020, our total annual income was £305.9 million.⁷

The British Red Cross operates in nine British overseas territories, and in accordance with our Royal Charter, these entities are known as overseas branches. Included in the British Red Cross group accounts are the accounts of the three overseas entities which are locally incorporated: the Bermuda Red Cross, the Cayman Islands Red Cross and the Turks and Caicos Islands Red Cross; and one related trust, the Bermuda Red Cross Charitable Trust. These are accounted for as subsidiaries, in accordance with the Statement of Recommended Practice (SORP).⁸ The Anguilla Red Cross, the British Virgin Islands Red Cross, the Falklands Islands Red Cross, the Gibraltar Red Cross, the Montserrat Red Cross and the St Helena Red Cross are accounted for as branches, in line with the SORP. 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. These include the Ethical Fundraising and Quality Assurance (EFQA) Committee, which has oversight of our ethical fundraising procedure and decides on all significant donations, partnerships, sponsorships and gifts in kind. As part of our due diligence, we will check if a company or private donor has its own Modern Slavery Act statement, and flag any accusations, press coverage and lawsuits connected to modern slavery, regardless of having a modern slavery statement. This information will form part of the decision-making on accepting the gift, donation or partnership. With this due diligence applied

rigorously in 2020, no gifts, donations or partnerships were declined. However we did decline a donation in 2019.

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 the 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 and 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 to promote awareness among our people of their responsibilities.

Our corporate policy framework is well established and our initial work when the Act was first introduced focused on:

- updating key policies and processes, including our employee handbook for staff
- ensuring our raising a concern (whistleblowing) policy made reference to the Act
- our commitment to maintaining the highest standards of conduct and ethical behaviour, which is conveyed to candidates during our recruitment process and throughout the induction stages.

⁷ £305.9 million is our total income, and not our net income.

⁸ Statement of Recommended Practice: Accounting and Reporting by Charities preparing their accounts in accordance with the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102).

Our supply chains and due diligence process

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. It remains a priority for us to explore our responsibilities beyond Tier 1 due diligence⁹, and work is ongoing in this regard.

The British Red Cross has one procurement and purchasing policy which is implemented by two procurement teams: a corporate procurement team, which focuses on our suppliers for UK-based programmes and operations; and an international logistics team, which focuses on procurement for our international programmes. The supply base for goods and services for our UK-based programmes has a high ratio of repetitive orders with the same suppliers, while the supply base relating to international operations has a majority of one-off suppliers and issues new tenders for each supply requirement.

In previous years, our corporate procurement processes have been updated to take account of the Act, and the risk of modern slavery has been incorporated in the due diligence process for key suppliers. Our international and UK programmes are becoming more aligned as we seek to take a unified approach to due diligence of all suppliers managed by UK and international procurement, and progress towards alignment will continue throughout 2021.

Currently, our due diligence, including compliance with the supplier code of conduct, largely relies on supplier self-certification. However, making our due diligence process more robust and proactive on our part has been a priority for us and one way of doing this is through proactively checking suppliers against third party databases. In 2020, we continued to improve this process through our counter-terrorism checks against a set of external third party databases on suppliers for our international programmes. This has been implemented across a number of British Red Cross-supported international programmes and national procurement initiatives and will continue to be a basic prerequisite for procurement above a given threshold. We plan to find ways to do these proactive checks for modern slavery too.

The counter-terrorism clause was part of 80% of all international grant agreements signed from July 2019 onwards¹⁰. In 2020, counter-terrorism checks were embedded in supplier creation and tendering processes for UK operations.

The British Red Cross supply base covering UK operations consists of a pool of 2,119 suppliers with

spend considered as sourceable¹¹. 96% of this spend is with UK-based suppliers, leaving 4% with non-UK based suppliers. 23% of our UK operations supplier spend has links to overseas supply chains. In recognition of this, we have commenced looking at the wider supply chain as part of our selection criteria. Suppliers must evidence their own due diligence of their supply chains as part of our procedures whereby within our due diligence questionnaire, we ask suppliers questions about how they are managing their own supply chains, including reference to and frequency of quality checks and auditing.

We are working with sector colleagues to share good practice and common approaches to due diligence in supply chains. We are also engaging with stakeholders across the Movement to develop consistent approaches and coordination through a common approach and sharing of supplier due diligence data and outcomes.

Supplier code of conduct

Since the end of 2018, confirming compliance with the supplier code of conduct has been part of the onboarding process for all **new key suppliers** for UK and international operations and programmes. Throughout 2020, **all existing** key suppliers for UK programmes, that we continue to use with a cumulative procurement value of £50,000 or higher, received the supplier code of conduct to sign.

As highlighted above, the international logistics team does not have a significant number of repeat suppliers, therefore every supplier submitting a bid against a tender is required to confirm compliance with our code of conduct as a component of the tendering procedure.

100% of our key existing suppliers (this mostly applies to UK programmes), as well as 100% of our new key suppliers (both UK and international programmes) have either signed the code of conduct, or alternatively the governance team has reviewed the supplier's policies, procedures, statements, codes of conduct and any other corporate instrument to confirm they have adequate commitments to address modern slavery risks in place. This was achieved with the further introduction of a gateway system within the supplier set-up, where the purchasing team will not allow a new supplier to be set up without a signed code of conduct.

In the case of existing property landlords, we have determined to require that they sign a code of conduct at the point of lease renewal, and for new property

⁹ Tier 1 refers to our first line of suppliers – the organisations we deal with directly as our suppliers. Tier 2 refers to the suppliers they in turn deal with, and so on.

¹⁰ A total of 5400 names were run through the database since July 2019.

¹¹ Sourceable spend is the portion of the organisation's total spend that can be influenced (ie, via negotiations, scoping market, etc), and for which savings opportunities can be explored. Non-sourceable categories are those that cannot be influenced or negotiated, and could include taxes, government payments, intercompany transfers, etc.

landlords at the point of acquisition. If the landlords refuse to sign an acceptable code of conduct, a decision will be escalated to senior management to proceed or not.

Supplier consolidation and e-procurement

Our supply base optimisation efforts were accelerated throughout 2020, achieving a further 34% reduction at the end of the year versus our 2017 base. In addition, we have introduced a new procurement system that has improved the transparency of our due diligence processes.

In 2021, we are planning to roll out the supplier relationship management (SRM) module within our existing platform, which will enable us to conduct a more structured monitoring and appraisal of our supply base.

We are working with sector colleagues to share good practice and common approaches to due diligence in supply chains. In 2020, members of the procurement team started to collaborate with counterparts in other charities via the Charity Sector Procurement Group, in order to gain more insight across the sector, with the hope of fruitful outcomes over 2021. We are also engaging with stakeholders across the Movement to develop consistent approaches and coordination through a common approach and sharing of supplier due diligence data and outcomes.

Supplier Ethical Data Exchange

We are a member of the 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 base via this database, and to scope the risk of modern slavery and our response to that risk.

During 2020, we began exploring the best ways of using these capabilities and information. It remains our objective for 2021 to embed Sedex where relevant across the supply chain, with consideration of corporate social responsibility risks as well as our diversity and inclusion agenda.

Training procurement and purchasing teams

Since 2019, the Red Cross online training module on recognising the signs of trafficking has been part of the onboarding process for all new starters in the corporate

procurement and international logistics teams. As a result, both teams have obtained 100% completion of this module meaning that all procurement personnel are trained in understanding what trafficking and modern slavery are, how to spot the signs and how to respond in line with our organisational safeguarding requirements.

Identifying risks in our supply chains and mitigation measures

Throughout 2020 we worked to address the following risk areas. However, work on all of these things is ongoing and therefore there remain risks that we will continue to work on in 2021 through the Modern Slavery in Supply Chains Working Group.

The working group consists of management level representatives from the relevant teams who are involved in working on our Modern Slavery in Supply Chains continuous improvement plan. This includes Procurement, International Logistics (International procurement), Corporate Governance, Workforce Policy (Expert Services), Fundraising Strategy, International Humanitarian Law, Legal Department, Policy Research and Advocacy, and UK and International Operational teams. This group meets once a quarter, to discuss actions in relation to the continuous improvement plan.

- Existing property landlords have not yet been required to complete the supplier code of conduct in the same way that all other key suppliers have. All of the landlords for new leases entered into from February 2020 have signed up to our code of conduct, and this will continue to be a standard requirement going forward. Existing property landlords are required to complete the supplier code of conduct at the lease renewal point.
- We currently rely on supplier self-certification as our mode of due diligence. We want to make this more robust and will explore ways to manage more proactive checks on suppliers beyond self-certification.
- We currently manage our supply chains at Tier 1 level, which means the suppliers with whom we directly engage. We have started to require suppliers with overseas supply chains to submit evidence of the work they are doing to manage those supply chains with regards to modern slavery. This is ongoing work and we will be doing more in connection with this risk area.
- We do not currently use all the capacity of Sedex to check suppliers' supply chains proactively. This is a missed opportunity and something we will aim to develop when more resource can be secured to do this.
- More focus needs to be given to our partnerships and

the organisations we provide grants to, particularly overseas, beyond the prevention and response to sexual exploitation, abuse and harassment (PSEAH) work detailed below. We are working with the IFRC to create a Movement-wide approach to due diligence that would provide us with the level of assurance we require.

- Our procurement and purchasing teams have all completed their training on modern slavery and trafficking, however we still require a larger number of people across the organisation to complete the training. Many people across the organisation have an involvement in purchasing for their own services and operations, or alternatively could encounter trafficking and modern slavery in the course of their work or volunteering duties, and therefore we require a higher completion rate to ensure we are able to identify and respond to trafficking appropriately and safely each time.

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)

Progress of such measures

Measure	Progress
<p>All new key suppliers receive and sign the supplier code of conduct as part of their onboarding process. If suppliers do not sign the code of conduct, we individually review their relevant policies to ensure the standards are met.</p>	<ul style="list-style-type: none"> - 100% of new key suppliers (including new property leases entered into from February 2020) have signed the supplier code of conduct or have had their policies assessed and checked to meet adequate requirements.
<p>All existing and repeat key suppliers receive and sign the supplier code of conduct. If suppliers do not sign the code of conduct, we individually review their relevant policies to ensure the standards are met.</p>	<ul style="list-style-type: none"> - 100% of existing key suppliers (excluding some existing landlords) have signed the code of conduct or have had their policies assessed and checked to meet adequate requirements.
<p>Proactive checks on suppliers are carried out beyond self-certification.</p>	<ul style="list-style-type: none"> - In 2019, we started conducting counter-terrorism checks as one effort to check on our supply base on a more proactive basis. - 5400 searches were carried out since July 2019.
<p>Requirement to check beyond Tier 1 suppliers.</p>	<ul style="list-style-type: none"> - We began requiring suppliers to evidence the action they are taking to manage their own overseas suppliers. We elevated this in 2020, by introducing a supplier management tool within our online procurement platform, enabling teams to take more control over our supply chain.
<p>Supplier consolidation.</p>	<ul style="list-style-type: none"> - In 2020 we delivered a further 34% reduction, bringing the total to 44% and surpassing our two-year target.
<p>Ethical screening conducted on all significant donations, partnerships, sponsorships and gifts in kind.</p>	<ul style="list-style-type: none"> - All significant donations, partnerships, sponsorships and gifts in kind continued to be screened. We did not decline any on the basis of modern slavery in 2020.
<p>Staff and volunteers are trained in understanding and detecting modern slavery and trafficking.</p>	<ul style="list-style-type: none"> - 100% of procurement personnel have completed the training and it is now part of the induction requirements of all new team members. - By March 2020, 100% of purchasing personnel had completed the training, and it is now part of the induction requirements of all new team members. - A total of 146 people in the British Red Cross were trained in module one in 2020.

Our policies and procedures in relation to human trafficking and modern slavery

Name	Details	Last updated or reviewed
British Red Cross Code of Conduct	The Code applies to all staff and volunteers, and seeks to ensure that we uphold the highest ethical, professional and quality standards to support people in crisis. It confirms that we will not tolerate (sexual) exploitation, abuse or violence.	Last reviewed in April 2019.
Employee Handbook	This sets out both ethical conduct and behaviour(s) expected of all staff operating both within the UK and abroad, whilst stating our commitment to ensuring the effective prevention of slavery and human trafficking from both our supply chains and corporate activities.	Last reviewed in February 2021.
Procurement and Purchasing Policy	This document provides a robust due diligence framework, incorporating a Supplier Code of Conduct, to ensure all procurement and purchasing activities are performed in line with our commitment to both ethical purchasing and the Modern Slavery Act 2015.	Last reviewed in July 2020.
Raising a Concern (whistleblowing) Policy and procedure	Applying to all employees and volunteers, this sets out both commitments and the process for (confidentially and anonymously) reporting suspected concerns at work, in relation to: suspected wrongdoing, risk or malpractice within the organisation - including concerns involving our supply chains and/ or any circumstances which may give rise to enhanced risk of slavery or human trafficking.	Last reviewed in May 2019. Updated in November 2020.
Recruitment and Selection of Staff Procedure (including agency workers)	This sets out our commitment to: maintaining the highest standards of employee conduct and ethical behaviour in our operations; and ensuring the effective prevention of slavery and human trafficking from both our supply chains and corporate activities. Only specified, reputable employment agencies are used to recruit staff; with the practices of any new agency vetted prior to accepting workers, ensuring they meet all requirements of those on our 'preferred suppliers' list.	Last reviewed in April 2017. Updated in August 2020.

Name	Details	Last updated or reviewed
Safeguarding Policy; Safeguarding Children and Young People Procedure; International Safeguarding and Prevention and Response to Sexual Exploitation, Abuse and Harassment (PSEAH) Procedure	<p>This Policy and associated Procedure illustrates out how we fulfil our obligations to safeguard children and adults who are being abused and/or harmed - or are at risk of abuse or harm. It details how to handle a concern about a child, young person, or adult who is at risk - including risks associated with modern slavery and trafficking, cited as two of our key safeguarding concerns.</p> <p>The International Safeguarding Procedure is currently under review to ensure it meets the needs of all our staff working overseas, whilst establishing a clear and robust reporting mechanism.</p>	Last reviewed in December 2020.
Transparency and Accountability Policy	<p>This Policy sets out how we will: publish information relating to both our structure and operations; enhance transparency; and enable stakeholders to evaluate our performance in delivering to people in crisis. It also includes our commitment to publish the Modern Slavery Statement annually on our website.</p>	Last reviewed in July 2019.
Incident Reporting Policy and Procedure	<p>This sets out our commitment to encouraging and supporting good practice in identifying, investigating, and learning from incidents – including implementation of mitigating actions. Its related Procedure sets out practical steps for reporting (via a corporate incident reporting system): incidents; safeguarding concerns; accidents, and near misses.</p>	Last reviewed in November 2020.
Ethical Policy	<p>This Policy sets out the ethical standards of our organisation, ensuring we take a consistent approach across our operations to act on our humanitarian mission: supporting people in crisis.</p> <p>When initiating new significant activities and/or partnerships, decisions will be informed by applying (best practice) due diligence assessments, ensuring these meet both our charitable objectives and ethical standards.</p>	Last reviewed in January 2021.

Safeguarding

We take our responsibility for keeping every child and every adult who comes into contact with the British Red Cross safe extremely seriously.

A business case has been submitted to the executive leadership team to consider the need to create the role of either a head or director of safeguarding who will be responsible for continuing to develop and oversee British Red Cross safeguarding work both in the UK and overseas. Over the past 12 months, we have continued to strengthen our safeguarding provision:

- We continued to expand the capacity of the safeguarding assurance team, which was established at the end of 2018. The team is made up of safeguarding specialists who are on hand to help our people respond to concerns regarding children and adults across all services and functions.
- We have set up a single point of contact safeguarding phone line (including out of hours), as well as a dedicated inbox to ensure the whole organisation is able to quickly access advice and support. The team quality assures all safeguarding cases reported through the British Red Cross' incident reporting system to ensure incidents have been correctly responded to and actions have been clearly evidenced and documented.
- In December 2020 we undertook a comprehensive update to all of our corporate safeguarding documents and have updated and strengthened our combined safeguarding policy, our safeguarding children procedure and our safeguarding adults procedure, which have been signed off by the executive director of UK operations. Work is now underway to update the international safeguarding procedure.
- We have mandatory online safeguarding awareness training for all our people to ensure that everyone knows how to recognise, respond to and report safeguarding concerns about children and adults. We continue to work with directorates and senior leadership teams to ensure that everyone has completed the course, and it has been included on the induction list for new starters. Our two safeguarding children and adult development managers produce tools and guidance for teams to promote on-the-job learning, including toolkits, guidance documents, example scenarios, and simple, accessible learning resources designed to be delivered and explored in forums such as team meetings and one-to-ones. They are also responsible for the development of training materials in line with our safeguarding learning and development strategy, which was developed and approved in 2020.

Where there are concerns that our staff, volunteers or partners may have been the perpetrators of abuse, we share these with the relevant authorities and bodies, including the Charity Commission, Disclosure and Barring Service, police, local authority designated officers (LADOs) and leads for allegations against People in Positions of Trust (PIPOT).

All safeguarding concerns across our work at the British Red Cross are recorded on Datix, an internal electronic incident reporting tool. Introduced in 2016, Datix enables our people to report safeguarding concerns so that we can follow them up, contribute effectively to external safeguarding investigations, make any necessary changes, and assist services with improving and developing their safeguarding approach and responses.

We report on safeguarding in our annual report. More information and statistics can be found [here](#).

There have been no recorded reports of modern slavery in our supply chains. The British Red Cross does not necessarily accept this as confirmation that there is no slavery or exploitation in our supply chains, rather as an incentive to roll out more training and to develop more rigorous processes to check for this.

Prevention and response to sexual exploitation, abuse and harassment (PSEAH)

The British Red Cross is committed to working with our Movement partners to strengthen organisational and community-based complaints mechanisms, and help ensure justice, support and accountability for every child and adult survivor. We have been supporting the development of specific policies and mechanisms to prevent sexual exploitation and abuse for use across the Movement. This connects to modern slavery risks because it includes sexual exploitation and abuse perpetrated by humanitarian workers, who are often people in positions of authority. Aspects of this section connects to the 'safeguarding across our services' section below.

As part of our role in Movement governance, and in collaboration with the UK Government, the British Red Cross co-led an open pledge at the 33rd International Conference of the Red Cross and Red Crescent in Geneva in 2019. This was a commitment to prevent and respond to sexual exploitation and abuse, and sexual harassment, in humanitarian action. Pledges are an important tool to encourage international conference members and observers – including members of the International Red Cross and Red Crescent Movement, and states that are party to the Geneva Conventions – to make measurable and action-oriented voluntary commitments, leading to concrete action in the interests of the most vulnerable.

The British Red Cross has worked alongside the Canadian Red Cross and the IFRC to develop an operational manual, Red Cross and Red Crescent manual on prevention and response to sexual exploitation and abuse: operationalizing practical actions to guide leadership, headquarters and field teams. This is available in a number of different languages and is being used to guide our capacity-building support with Red Cross and Red Crescent Movement partners. It has also been shared with other humanitarian actors, for example via the UK Government's Foreign, Commonwealth and Development Office, CHS Alliance and Project Soteria, a UK-funded programme with INTERPOL to strengthen vetting of potential aid workers.

The British Red Cross is committed to employment cycle initiatives to help identify abusers and prevent sexual exploitation and abuse. All of our staff deploying overseas are Disclosure and Barring Service (DBS) checked and all rostered staff deployed overseas are already on a pre-trained and pre-checked register. We are actively working together with other agencies to support the development of employment cycle initiatives, including the Inter-agency Misconduct Disclosure Scheme, Aid Worker Passport/Registration Scheme and Project Soteria. We recognise that many of the employment cycle measures are aimed at stopping perpetrators before they are able to commit any incident, which must be a priority. However, this needs to occur within a wider platform which addresses inequality and power imbalance, encourages disclosure, and protects and assists people who have experienced abuse.

We are working with our National Society partners to apply standards for prevention and response to sexual exploitation and abuse in the international programmes we support, and help build National Societies' capacity to prevent and respond to sexual exploitation and abuse.

We have specific standards that we expect our partner National Societies to meet. These expectations are outlined in our due diligence framework and our grant agreement documents. The standards require our partners to disclose complaints and apply zero tolerance to sexual exploitation and abuse. We are currently in the process of enhancing these requirements related to the prevention of sexual exploitation and abuse, and mechanisms for increased accountability.

We have a responsibility to cascade through our networks and to focus efforts on the places where the risks and vulnerabilities are greatest. We recognise that this is not a short-term endeavour and we are committed to mainstreaming prevention and response to sexual exploitation and abuse as part of our minimum actions for safe and inclusive programming. 'Safe and inclusive' is an umbrella term that encompasses different areas of British Red Cross' international work, including protection, gender, and inclusion (terminology used by the IFRC and within the

international humanitarian sector), prevention and response to sexual exploitation and abuse, community engagement and accountability, and safeguarding. Minimum activities related to each of these areas must be integrated during the design stage of all international programmes supported by the British Red Cross. In addition, we also work with several Movement partners to strengthen organisational systems and culture in coordination with the prevention of sexual exploitation and abuse networks in country.

In 2020, British Red Cross international country managers received refresher training on the provision of capacity-strengthening support to partner National Societies in preventing and responding to sexual exploitation and abuse.

We are currently working with four Red Cross and Red Crescent National Societies – Nigeria, Namibia, Eswatini and Bangladesh – to strengthen their capacity and capabilities to prevent and respond to sexual exploitation and abuse. This includes advice, training, and accompaniment support for establishing policies and procedures, conducting assessments, and developing and supporting implementation plans. We also respond to ad hoc requests for support, for example we are currently providing advice to support the emergency response to the displacement of people in Ethiopia, and developing training to support programmes in the Sahel. In partnership with the UK Foreign, Commonwealth and Development Office (FCDO), we are also piloting a dedicated regional resource on the prevention and response to sexual exploitation in southern Africa.

Through our community engagement and accountability approaches, we have developed material to empower and enable crisis-affected people to report concerns. The British Red Cross has established an online Community Engagement and Accountability Hub, which includes resources and good practice case studies for establishing community complaints and feedback mechanisms.

The Inter-Agency Misconduct Disclosure Scheme was launched in the international aid sector in January 2019. Engaging in this scheme renewed effort to protect the British Red Cross from recruiting individuals who will seize opportunity to harass, exploit and abuse those with less power than them, especially in humanitarian settings. It doesn't replace other existing processes, such as police checks. Rather, it picks up perpetrators who have had disciplinary processes completed against them, or who are subject to ongoing investigation, but who may not have been investigated or convicted by the police.

Our international human resources team has been working to implement this scheme in our recruitment process for all international directorate staff, including UK-based and overseas staff, and seconded delegates.

Staff hired locally in country will use the scheme through the IFRC onboarding processes. As part of the scheme, new staff in the directorate will be required to provide a statement of conduct from previous employers (covering the period of the last five years of employment).

The Inter-Agency Misconduct Disclosure Scheme aims to ultimately cover, over the next five years, all staff of a majority of humanitarian and development organisations. The scheme doesn't hold any information on specific cases of abuse, which allow this initiative to respect legal requirements concerning personal data. To date, around ten perpetrators have been stopped from moving from one organisation to another. As part of the scheme, the British Red Cross is required to submit implementation data by 31 January each year. Data is published on the Steering Committee for Humanitarian Response's website in early February each year.

Training and guidance for our people

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

We have two specific training modules:

Module 1 was made available in 2015 on the International Federation of Red Cross and Red Crescent Societies (IFRC) learning platform for the IFRC and all 192 National Societies. It provides a basic introduction and response to trafficking and is designed for all British Red Cross staff and volunteers. In 2020, 146 learners completed this e-module.

We also delivered a bespoke, bitesize learning session for the British Red Cross Hardship Fund team, who co-ordinate the provision of financial support to people who are struggling as a result of the coronavirus crisis, to enable staff to spot the signs of trafficking and know how to report 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, which are fundamental principles we are required to abide by, help us to provide non-directive information enabling people to make their own informed choices. In 2020, 57 learners completed e-module two, and we trained 16 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
- 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, abuse and harassment (PSEAH)
 - child protection at the IFRC
 - principles and rules for Red Cross and Red Crescent humanitarian assistance.

Moving forward, we will use both the British Red Cross learning platform and the British Red Cross intranet to continue to promote these training modules to increase awareness among 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 need to raise a concern.
- Specific guidance in relation to section 52 of the Modern Slavery Act, which covers the duty to notify the Home Office of potential victims of modern slavery.
- 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. It 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.

New training module

The new e-module 'Understanding and responding to trafficking in persons' provides an introduction to trafficking for Red Cross and Red Crescent staff and volunteers, and an overview of the impact of Covid-19 on trafficking in persons. The development of the e-module was led by the British Red Cross, in partnership with the Australian Red Cross and the IFRC. The e-module aims to strengthen the knowledge and capacity of Red Cross and Red Crescent staff and volunteers to recognise and respond to trafficking. It is currently available in English on the IFRC learning platform and will soon also be available in French, Spanish, Arabic and Russian.

We continued to work with the IFRC and National Societies to strengthen knowledge and capacity at the local and regional level. Due to the challenges presented by the Covid-19 pandemic, we adapted our training to remote learning. We delivered remote training to a number of National Societies in various regions, including to colleagues in the Americas as part of a regional capacity-building project.

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.

In recognition of our commitment to supporting people in crisis through our anti-trafficking work, one of our key 2020 delivery pledges in our corporate business plan was to see reduced destitution and distress for displaced people.

Since 2009, the British Red Cross has supported survivors of trafficking and modern slavery. Our focus is on ensuring that survivors of trafficking are provided with the support they need to recover from the trauma they have experienced, and that they are enabled to make informed choices about their futures. Anti-trafficking remains a core priority of the 2030 British 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 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 Movement-wide response to trafficking, working with Red Cross and Red Crescent Movement staff and volunteers across the world to build capacity and develop projects that put the unique vulnerabilities of trafficked people at their core.

We believe that providing the right information at the right time enables survivors of trafficking 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. We have developed a collaborative approach that includes the development of services in partnership with people with lived experience of trafficking and modern slavery.

In the UK, our volunteers and staff work alongside civil society, the 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. We focus on:

- Providing 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 advocating 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.
- Working with trafficked people to make their own informed choices, and supporting them in the choices they make.

Safeguarding across our services

The British Red Cross requires that all safeguarding incidents are reported and investigated to ensure good practice and generate learning outcomes to reduce reoccurrence and monitor performance.

These are reported through Datix¹² directly by staff and volunteers, which can be accessed via an icon on their desktop.

The majority were reported by our refugee support and restoring family links (RSRFL) teams, and there were also some reports from crisis response and retail. The 23 cases reported represented 1.5% of the total safeguarding reports for the year. There were also 22 cases where the term 'trafficking' was referenced in the incident description that are not captured here because they were reported under a different category, which may have been the main safeguarding issue at that time.

A new reporting category was also added to Datix in 2020 for which teams in the RSRFL directorate were asked to tick a box if the person they were submitting a safeguarding report about was also being supported by the British Red Cross anti-trafficking team. This box was ticked 32 times.

These figures will not be reflective of the full organisational picture for the following reasons:

- Not all modern slavery cases will be categorised on the incident reporting system under this description. For example, some may be categorised by reporters as sexual abuse, physical abuse or psychological abuse and so would not appear in the above figures.
- There is no statutory category of modern slavery for children's safeguarding, so any children affected would have been recorded under one of the four child abuse categories (physical, sexual, emotional, neglect).
- There is a recognised challenge of underreporting of all safeguarding concerns across the organisation which we are working to address. Many of the

¹² All safeguarding concerns across our work at the British Red Cross are recorded on Datix (an internal electronic incident reporting tool). Introduced in 2016, Datix enables our people to report safeguarding concerns (and other incidents, accidents and near misses) quickly so that we can follow up, contribute effectively to external safeguarding investigations, make any necessary changes, and assist services with improving and developing their safeguarding approach and responses.

cases will have simply been logged in a service's database (beneficiary relationship management system) reports and not added to Datix.

- The anti-trafficking team does not record all of its cases on Datix as this would not be a viable case management system, so only cases where there are additional safeguarding concerns, or exceptional or complex modern slavery concerns, will have been recorded.

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 standalone 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, in the North West, the East Midlands and London, who deliver some core services and also operate restricted funded projects:

- Your Space – initial support (pre National Referral Mechanism)

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 the 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 the 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.

This programme was evaluated towards the end of 2019, and the findings of the evaluation is being used to develop and improve the service.

- Longer term support

In 2019, we delivered and concluded an integration pilot in collaboration with Hestia and Ashiana. Using three innovative models of support, the partners provided medium to long-term care to survivors of trafficking exiting the National Referral Mechanism (NRM) provision.

Qualitative data was gathered consistently so we were able to measure the impact of this support model.

The report from this STEP pilot, called 'Hope for the Future', can be found here.

We continue to offer this model of support across all our delivery points, and delivered it through our Renew and Pathways projects, which both ended in 2020.

- 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 people seeking asylum 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 reconnect, we can help them search for their loved ones. Our restoring family links service helps people look for family members, restore contact and reunite families, and seeks to clarify the fate of those who remain missing.

Reception centres

Our emergency response teams are asked to set up reception centres for exploited and potentially trafficked people when 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.

In 2019, we conducted an evaluation of this model of intervention and we are working with authorities to improve this offer based on the findings. The report is available [here](#).

Support to the International Red Cross and Red Crescent Movement

The British Red Cross is committed to using its learning and experience to support the wider international Red Cross and Red Crescent Movement by providing guidance, funding and technical expertise. In turn, this will 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 engaging with multiple National Societies and the International Federation of Red Cross and Red Crescent Societies (IFRC) in different regions. Our anti-trafficking offer is comprehensive and encompasses a variety of activities, from implementing minimum standards to developing specialist support services, and includes the development of context-specific tools, capacity building and other resources according to target audience and identified needs. Our work is guided by context-specific requirements, gaps and capabilities identified by or together with National Societies.

We have been working closely with Movement components in Asia-Pacific, Europe, the Americas and in Africa, to share learning and promote interventions aimed at reducing risks, and recognising and responding to trafficking. Our interventions focus on strengthening capacity and supporting people who are at risk of or facing exploitation in migration and displacement contexts, in line with the British Red Cross 2030 corporate strategy.

We take part in international and national networks and working groups, where we work collaboratively to share strategies, priorities and best practice. We monitor and support policy changes, so that we can improve identification, prevention and provision of services for survivors of trafficking in the international context.

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, prompting collaboration and sharing practice.

We represent the IFRC on the Global Protection Cluster Anti-Trafficking Task Team and help coordinate efforts across IFRC and National Societies on trafficking-related matters.

We administrate the Trafficking Response Hub (trafficking-response.org), which is an initiative to share resources and knowledge about human trafficking and safe migration among the IFRC and National Societies. We also support the coordination of the page 'Protection related to trafficking in persons' on the IFRC/ICRC Protection Community of 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 the British Red Cross' core work, focused on building improved evidence of 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](#).

Using our voice: Advocating for improvements to the protection of 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.

We have continued to build on our work to speak out about the risk factors and issues we're seeing in people accessing the support they need. In 2020, we continued our work with the Home Office, bi-laterally and through various stakeholder groups, to elevate these concerns.

We became part of the advisory group of the International Anti Human Trafficking Network, which connects UK-based organisations working globally in the anti-trafficking movement, contributing to policy and sharing best practices to increase our collective impact. Together we submitted a letter to government in relation to the impact of Covid-19 on modern slavery and our recommendations on how the UK can help shape the global response to address this.

We continue to be members of the international and victim support subgroups of the Modern Slavery Strategy Implementation Group.

One of our key reports in 2020 was the First Steps to Safety? report. Across the UK, the British Red Cross provides emergency support at temporary reception centres, set up for people recovered during police operations to disrupt exploitation and human trafficking.

Our research shows that, while reception centres did offer people immediate respite, the time pressure, conflicting priorities, and limited support options for survivors meant that they did not offer people routes to safety.

- Survivors of trafficking, slavery and exploitation

were often afraid of both the people exploiting them and the authorities. Issues of fear and trust were the biggest barriers stopping people taking up the help that was on offer.

- People's safety and protection was not always the focus of the reception centres observed. The risks of retribution from traffickers, the threat of immigration enforcement and the potential for people to be less trusting of the authorities when they left were evident. Most worryingly, most people taken to a reception centre during the research either returned to their previous situation or were arrested by officers from Immigration Enforcement.
- The lack of certainty about onward support could leave people potentially more vulnerable than when they arrived. None of the people who attended the reception centres agreed to enter the National Referral Mechanism (NRM), the UK government's system for determining whether it believes a person is a survivor of trafficking and providing support for survivors. And if people did not agree to enter the NRM, there were few other options offered.
- People need time, space and support before they make significant decisions about their future. People leaving situations of exploitation are often asked to make decisions in a short space of time, without access to legal advice or any certainty of the support they will receive after the NRM.

Next steps

We will continue to build on these existing strands of our work. We have identified the following key priorities for 2021:

Overarching actions

- Continue to develop and improve our oversight of our work to eradicate the risk of modern slavery in our supply chains.
 - We will do this in 2021 by conducting a mapping exercise to assess where in our supply chains and operations we're currently carrying a risk, so that bespoke plans can be made to address this. This will address section 54(5) (d) of the Modern Slavery Act.
 - We will develop our framework to measure effectiveness, so that we're more accurately measuring measure both the implementation of methods and the external impacts of those methods in achieving our desired outcomes. This will address section 54(5) (e) of the Modern Slavery Act.

Suppliers and partners

- Continue to consolidate suppliers and transition to an e-procurement system.
- Continue to develop ways to address the risks identified in our procurement processes by continuing to move beyond reliance on self-certification and Tier 1 due diligence.
- Continue to build on our work with the IFRC to develop a movement-wide approach to procurement.

Safeguarding

- Work will continue to review, implement and embed the recommendations from the 2019 Keeping People Safe consultancy throughout 2021.

Training

- Seek further completion of the online e-module (Module 1) across the organisation and deliver face-to-face training (Module 2) to frontline caseworkers via virtual classrooms.

- Continue to monitor completion of mandatory training on code of conduct, safeguarding, data matters, equality, diversity and inclusion, and health and safety by all staff and volunteers.
- Roll out the global e-module 'Understanding and responding to trafficking in persons' in French, Spanish, Russian and Arabic. Monitor completion of the e-module in the five available languages.

Anti-trafficking programmes

- Continue to monitor the UK context to identify new and emerging needs, and seek to evolve our services to meet those needs.
- Continue to develop strong partnerships across the anti-trafficking sector.
- Continue to champion anti-trafficking work within the International Red Cross and Red Crescent Movement.