



Modern Slavery Statement

The 2021 **statement** from
the British Red Cross

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The Covid-19 pandemic has continued to impact communities worldwide, along with other global crises such as climate change, conflict and discrimination. Although trafficking can occur at any time before, during or after a crisis, emergencies can increase trafficking trends and give rise to new ones.

At the British Red Cross we are concerned that Covid-19 has increased the number of people at risk of being trafficked and exploited. The pandemic has also exacerbated people's experiences of exploitation and impacted recovery among people who have broken free of it.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 crisis. 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 Societies,³ 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 war.⁴ This gives the British Red Cross 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 unique opportunity to build a relationship between a National Society and its government.

While it is an auxiliary to Her Majesty's Government, the British Red Cross is required to maintain its autonomy so that it can act in accordance with its fundamental principles.⁵

The British Red Cross is also a member of the Disasters Emergency Committee (DEC), an umbrella organisation that brings together 15 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.

Our anti-slavery commitment

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

We are committed to recognising and responding to trafficking and other forms of modern slavery, both where we encounter it in our supply chains and as a key part of our service operations. As part of this dual commitment, we support people in crisis through our anti-trafficking work and safeguarding response.

In our 2030 strategy we made a commitment to support people who are at risk of being, have been or continue to be exploited. That's why we deliver bespoke and enhanced support for people who have been trafficked or subjected to modern day slavery. Each year, we support tens of thousands of people through our services across the UK, including 319 adults and children who have experienced trafficking. We aim to expand this work in 2022 across our UK and overseas operations.

Our anti-trafficking work aims to ensure that any adult or child who is trafficked or exploited will be recognised, supported and protected. Our work also aims to help adults 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 2021. 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.

Building on our statements from previous years, this statement highlights new developments and important initiatives we have taken in 2021 to reduce the likelihood of exploitation, trafficking and other forms of modern slavery from our supply chains and in our organisation, and to support people who have experienced trafficking and abuse. This statement was approved by the Board of Trustees at its meeting on 12 April 2022.



Elizabeth J. Padmore, chair, Board of Trustees
(on behalf of the board)



Mike Adamson, chief executive officer



Martin Halliwell, chief finance officer
(on behalf of Britcross Limited, our retail trading arm)

¹ International 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](https://www.trafficking-response.org/covid-19)

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

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

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

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

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Our progress in 2021

In the spirit of continuous improvement, we've made further changes to our approach over the past 12 months. These developments are communicated to our staff and volunteers on an ongoing basis.

Governance

- We have made considerable progress towards ensuring our staff and volunteers understand and comply with our British Red Cross code of conduct. The code confirms that we will not tolerate exploitation, including sexual exploitation, abuse or violence. It sets out our processes and systems to report incidents.
- Following the outcome of an internal audit on the code of conduct:
 - We revised the training module on our code of conduct - aided by a new video, which emphasises our whistleblowing hotline, Safecall, and the importance of reporting any breach of the code. By the end of 2021, the training had been completed by every member of the organisation's board, executive leadership team and governance team, 4,228 out of 4,525 staff members, and 5,385 of over 12,000 volunteers, representing:
 - 93% of staff, compared to 87% in 2020
 - 45% of volunteers, compared to 22% in 2020
 - We put in place a new centralised end-to-end process for appointing contractors and consultants. It ensures the code is embedded into their recruitment and onboarding processes. These groups are required to complete the related training prior to starting their work with us.
- We have improved our systems for capturing misconduct cases in detail and facilitating accurate reporting to senior management, identifying learning and implementing actions.
- As part of our aim to create a culture where people feel able to speak up, we revised our policy and procedure for raising concerns within the organisation. The new process involved the Freedom to Speak Up Guardian roles, which offer staff and volunteers who want to speak up an independent and impartial source of advice, and an additional way of raising concerns.

Suppliers and partners

- We used our ethical fundraising procedure throughout 2021 to screen all significant donations, partnerships, sponsorships and gifts in kind for modern slavery issues.
- Our supplier consolidation efforts continued - we've now reduced the number of our suppliers by 40% since 2017.
- We continued our move towards the gateway and e-procurement system. This requires all of our suppliers to sign the supplier code of conduct before they are activated on our procurement system.

- The new supplier creation process we developed and implemented in 2021 ensures that all new suppliers, including those not on e-procurement, must sign up to our supplier code of conduct before they are added to our financial system and we conduct any business with them.

Safeguarding

- In July 2021, we appointed a Director of Safeguarding.
- We are now progressing the Keeping People Safe recommendations alongside a wider safeguarding action plan.
- Our internal tool for reporting incidents, including safeguarding concerns, includes a tick box to indicate whether someone has also received support from the anti-trafficking team. In these cases, both the Safeguarding Assurance team and Anti-trafficking team are working to improve our organisational response.
- We also appointed an Investigation Manager to investigate serious incidents and recommend improvements to our policies, training, processes and systems to prevent serious incidents reoccurring.
- Since January 2019, the international directorate of the British Red Cross has been engaging in the Inter-Agency Misconduct Disclosure Scheme (MDS). This scheme is designed to prevent the movement of perpetrators of sexual exploitation, abuse and harassment (SEAH) from one organisation to another. It connects to modern slavery risks because it includes sexual exploitation and abuse perpetrated by humanitarian workers. This process has been operating since January 2021. Consequently, we have committed in our recruitment in international to:
 - systematically check with previous employers about any SEAH issues during the recruitment process
 - systematically respond to such checks from other organisations
 - monitor data and submit it to the Steering Committee for Humanitarian Response on an annual basis.

Our work in 2021

Anti-trafficking programmes

- We continued to adapt our ways of working as the pandemic evolved so we could support survivors of trafficking and those at risk from it through the provision of holistic casework support. Internal support and guidance is available for every member of staff on identifying and working with survivors. This will maximise our impact and reach, so that any survivor who comes into contact with the British Red Cross is provided with accurate information to make an informed decision about their future.
- We continued work through the Red Cross and Red Crescent Movement, and international and national networks and working groups, to strengthen our response to trafficking. We developed tools and training materials on human trafficking, and supported National Societies with capacity building activities and delivering remote and face-to-face training.

Using our voice

- Our focus in 2021 has been advocating for longer-term support for survivors of trafficking so they can recover and start to rebuild their lives in the UK. We have worked with partners across the voluntary sector and with Members of Parliament to advocate for changes to the Nationality and Borders Bill so that all survivors of human trafficking have longer-term statutory support for a year and those with insecure immigration status have leave to remain for 12 months.

Training

- Anti-trafficking training was integrated into the Core Safeguarding training which launched on 1 March 2021. Everyone who completes this training is now prompted to consider trafficking as a safeguarding concern and enroll on the introductory module to anti-trafficking.
- The introductory module is targeted at key teams in higher risk areas of the organisation. In 2021, 191 people were trained through the online e-module. At the time of writing, 100% of staff working in purchasing and procurement, international logistics, internal audit, and health safety and security have completed the training.
- We continued to promote advanced training targeted at Refugee Support teams providing casework support. In 2021, 58 people completed online training in anti-trafficking casework skills. In addition, we adapted our classroom-based casework skills training to remote delivery and 78 people were trained using this approach.
- We continued to support the roll-out of a global e-module on human trafficking, 'Understanding and Responding to Trafficking in Persons', in partnership with the Australian Red Cross and the IFRC. It aims to improve the ability of Red Cross and Red Crescent staff and volunteers to recognise and respond to trafficking. In 2021 we funded the translation of the e-module into French, Spanish and Arabic to increase the training's reach. During 2021, 99 staff and volunteers accessed the e-module.



Photo © Kate Stanworth/BRC

Our governance structure

The British Red Cross has its head office in London. In 2021, our total annual income was £226.5 million.⁷

The British Red Cross operates in nine British overseas territories:

- Four subsidiaries which are locally incorporated and are included in the British Red Cross group accounts: the Bermuda Red Cross, the British Virgin Islands 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 and:
- Five branches: the Anguilla Red Cross, the Falklands Islands Red Cross, the Gibraltar Red Cross, the Montserrat Red Cross and the St Helena Red Cross.

Also, included in the group accounts are the accounts of Britcross Limited, a wholly owned trading subsidiary which donates its trading profits 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 whose 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 responsible for agreeing our overall strategic direction and is our highest decision-making body. Also, the board ensures that we are effective in working towards achieving our vision, using our resources to maximum effect and upholding our fundamental principles and values.

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. With this due diligence applied rigorously in 2021, one donation was declined.

The board works closely with the executive leadership team (ELT), which is responsible for the day-to-day management of the organisation and is led by the chief executive. Together, the board and ELT approve and oversee the implementation of our group corporate strategy. This includes managing the governance of the organisation through policies and procedures, which set out a clear framework for our activities and services.

Policies and procedures, and related training, 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 have a well-established and comprehensive corporate policy framework in place to ensure our people understand what is required of them, and to capture the specific risk of modern slavery and trafficking in our supply chains or in any part of our work.

When the Act was first introduced, our initial work focused on reviewing and updating key policies, procedures and corporate documents, including our handbook for staff and related training modules. It also prioritised ensuring our policy on raising a concern (whistleblowing) made reference to the Act and our commitment to maintaining the highest standards of conduct and ethical behaviour. Our progress in these and other areas is presented specifically under 'Our Progress in 2021' and generally throughout this statement.

⁷ £226.5 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 encounter it as part of our work, including in our supply chains, or any part of our operations. It remains a priority for us to explore our responsibilities beyond Tier 1 due diligence.⁹

The British Red Cross has one procurement and purchasing policy. This is implemented by all teams, including the 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 to suppliers. While the supply base relating to international operations has a majority of one-off suppliers and issues new tenders for each supply requirement.

Our corporate procurement processes take account of the Modern Slavery Act, and the risk of modern slavery is 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 for all suppliers managed by UK and international to procurement. Progress towards alignment will continue throughout 2022.

Currently, our due diligence for low-value suppliers, including compliance with the Supplier Code of Conduct, largely relies on supplier self-certification. Our ambition is to make our due diligence process more robust. The British Red Cross supply base covering UK operations now consists of a pool of approximately 1,750 active suppliers with sourceable¹⁰ spend, 96% of which is with UK-based suppliers, leaving 4% with non-UK based suppliers.

Our UK operations supplier spend has links to overseas supply chains, so we look at the wider supply chain as part of our selection criteria for key suppliers above a given threshold and risk areas. Suppliers must give evidence of their own due diligence of their supply chains as part of our procedures, 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 to supplier due diligence.

Supplier code of conduct

Since the end of 2018, confirming compliance with the BRC Supplier Code of Conduct has been part of the onboarding process for all **new key suppliers** for UK and international operations and programmes. As mentioned, 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.

One hundred percent of our key existing suppliers (this mostly applies to UK programmes), as well as one hundred percent of our new key suppliers (both UK and international programmes) have either signed the supplier code of conduct, or have their policies, procedures, statements, code of conduct and other relevant corporate instruments checked to confirm they are committed to addressing and mitigating modern slavery. Our gateway system will not allow a new supplier to be set up without a signed supplier code of conduct or robust evidence of their commitment to mitigating modern slavery risks.

In the case of existing property landlords, we require them to sign a code of conduct at the point of lease renewal, and for new property landlords, at the point of acquisition. If the landlords refuse to sign an acceptable code of conduct, the decision of whether to proceed or not will be escalated to senior management.

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 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.

Supplier consolidation and e-procurement

Our supply base optimisation efforts were accelerated throughout 2020 and 2021, achieving a further 40% reduction in suppliers at the end of the year versus our 2017 base. In addition, we continue to use our procurement system to improve the transparency of our due diligence processes.

In 2021 we started testing the supplier relationship management (SRM) module within our existing platform, and we plan to roll this out in 2022. This will enable us to conduct 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. Members of the procurement team continue to collaborate with counterparts in other charities via the Charity Sector Procurement Group, in order to gain more insight across the sector. With stakeholders across the Movement we share approaches and practice, including sharing of 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. This membership allows us to assess our supply base via this database, and to scope the risk of modern slavery and our response to that risk.

We began exploring the best ways of using these capabilities and information in 2021. We started to onboard our suppliers into Sedex and plan to continue doing this with the help and advice of the Sedex expert team throughout 2022. We'll also take into consideration corporate social responsibility risks, as well as our diversity and inclusion agenda.

Training procurement and purchasing teams

As mentioned, the training module on recognising the signs of trafficking is now part of the onboarding process for all new starters in the corporate procurement and international logistics teams, who are both 100% compliant. This means that all procurement personnel are trained in understanding trafficking and modern slavery, how to spot the signs and how to respond.

Identifying risks in our supply chains and mitigation measures

Throughout 2021, we worked to address the following risk areas. This work is ongoing and we will continue to address risks in 2022 through the Modern Slavery in Supply Chains Working Group.

The working group consists of management-level representatives from team involved in working on our Modern Slavery in Supply Chains continuous improvement plan. This includes Procurement, International Logistics

(international procurement), Corporate Governance, Workforce Policy, Fundraising Strategy, International Humanitarian Law, Legal Department, Policy Research and Advocacy, and the 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. Since February 2020 all landlords for new leases, or where leases are being renewed, have been asked to sign the code of conduct. Over 85% have done so and where they have refused, mainly due to already having their own code in place, an exemption to proceed has been approved by the CEO on a case-by-case risk assessment.
- While we still currently rely on supplier self-certification as our mode of due diligence, we recognise the need to make this more robust. As such, in 2021 the Procurement Team started the onboarding of suppliers to Sedex, and used the tool to carry out checks on suppliers. At the moment supplier membership of Sedex is voluntary. The Procurement Team will continue to collaborate with Sedex experts to maximise the numbers of our suppliers that become members, especially the suppliers in high-risk areas.
- We currently manage our supply chains at Tier 1 level, which are the suppliers we directly engage with. We have started to require suppliers with supply chains that represent a particular risk to submit evidence of the work they are doing to manage those supply chains with regards to modern slavery.
- 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 will provide us with the level of assurance we require.
- While our procurement and purchasing teams have all completed their training on modern slavery and trafficking, many other people across the organisation have an involvement in purchasing for their own services and operations, or could encounter trafficking and modern slavery in the course of their work or volunteering duties. We continue to target these teams with online anti-trafficking training for those likely to come into contact with survivors of trafficking.

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 against measures

Measure	Progress
<p>All new and existing 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 2021) and existing suppliers (excluding some landlords) have signed the supplier code of conduct or have had their policies assessed and checked to meet adequate requirements.
<p>Requirement to check beyond Tier 1 suppliers.</p>	<ul style="list-style-type: none"> - We continued requiring key suppliers to evidence the action they are taking to manage their own overseas suppliers. As part of the SRM module on the procurement platform that will be rolled out in 2022, suppliers will be required to reconfirm their compliance to the Modern Slavery Act.
<p>Supplier consolidation.</p>	<ul style="list-style-type: none"> - In 2021 we'd reduced our suppliers by 40% compared with 2017.
<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 continue to be screened. We declined one donation on the basis of modern slavery in 2021.
<p>Staff and volunteers are trained in understanding and detecting modern slavery and trafficking.</p>	<ul style="list-style-type: none"> - 100% of purchasing and procurement personnel had completed the training, and this is now part of the induction requirements of all new team members. - 100% of international logistics personnel have completed the training and this is now part of the induction requirements of all new team members. - 100% of internal audit personnel have completed the training. - 100% of health safety and security personnel have completed the training. - A total of 191 people in the British Red Cross were trained in e-module one in 2021.

Our **policies** on covering human trafficking and modern slavery

Name	Details	Last updated or reviewed
British Red Cross Code of Conduct	It applies to all staff and volunteers, and, among other key commitments, confirms that we will not tolerate (sexual) exploitation, abuse or violence. It requires that any breach to the code is reported.	Last reviewed in April 2019 and next review is due in April 2022.
Employee Handbook	It applies to all staff and sets out ethical behaviour expectations, and our commitment to ensuring the effective prevention of slavery and human trafficking from both our supply chains and corporate activities.	This document does not follow a scheduled review cycle and was last updated in January 2022.
Procurement and Purchasing Policy	This 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 updated September 2020 and next review is due in June 2023.
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. These include concerns involving our supply chains and/ or any circumstances which may give rise to increased risk of slavery or human trafficking.	Last reviewed in May 2021 and next review due in May 2024.
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 in both our supply chains and corporate activities.	Last reviewed in May 2021 and next review due in May 2024.

Name	Details	Last updated or reviewed
Safeguarding Policy; Safeguarding Children and Young People Procedure; Safeguarding Adults Procedure; International Safeguarding and Prevention and Response to Sexual Exploitation, Abuse and Harassment (PSEAH) Procedure	This policy – and associated procedures – sets out how we fulfil our obligations and handle concerns in relation to safeguarding children and adults who are (or are at risk of) being abused. This includes risks associated with modern slavery and trafficking, cited as two of our key safeguarding concerns.	Last reviewed in December 2020 and next review due in December 2023.
Transparency and Accountability Policy	It sets out how we will publish information relating to our structure and operations, enhance transparency and enable stakeholders to evaluate our performance in delivering to people in crisis. It includes our commitment to publish the Modern Slavery Statement annually on our website.	Last reviewed in July 2019 and next review due in July 2022.
Incident Reporting Policy and Procedure	This policy and associated procedure set out our commitment to encouraging and supporting good practice in identifying, investigating, and learning from incidents, and the practical steps for reporting.	Last updated September 2021 and next review due in November 2023.
Ethical Policy	<p>It sets out the ethical standards of our organisation.</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 updated in January 2021 and next review due in January 2024
Professional Boundaries Procedure	It sets out our commitment to ensuring that relationships between those who use our services and the Red Cross people who deliver them are appropriately set up and maintained. We use professional boundaries in order to protect everyone and ensure that our service users receive respect and are treated with dignity at all times.	Last updated December 2019 and next review due in August 2022.

Safeguarding

We take our responsibility for keeping every child and every adult who comes into contact with the British Red Cross safe extremely seriously. As confirmed previously, modern slavery is now an integral part of our safeguarding policy and procedures. It is now categorised on our internal reporting system as a form of adult abuse.

We created a new role, a Director of Safeguarding, in 2021 who is responsible for developing and overseeing British Red Cross safeguarding work, both in the UK and internationally.

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 offer assurance, guidance, advice and oversight of reported safeguarding concerns.
- We continue to offer 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 access advice and support quickly. The team quality monitors and assures all safeguarding cases reported through our incident reporting system. This ensures incidents have been correctly responded to and actions have been clearly evidenced and documented.
- In March 2021 we developed and launched safeguarding core training. This was essential training for several of our directorates, including Refugee Support, Restoring Family Links and Anti-trafficking. We revised this training and published version two in December 2021. It includes a section in Must Reads on Human Trafficking and links to the two anti-trafficking modules. We are now aiming to align, connect and articulate differences between UK and international safeguarding policy and various procedures.

We provide safeguarding awareness training to all our people as part of the mandatory training offered and monitored by the organisation. It ensures 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, monitor compliance rates and share information about gaps with senior leadership teams. The training is also part of the induction for new starters. Our safeguarding children and adult development managers produce tools and guidance in line with our safeguarding learning and development strategy, developed and approved in 2020.

Our anti-trafficking training complements our safeguarding approach, highlighting our safeguarding responsibility to survivors of trafficking and modern slavery.

Where there are concerns that our staff, volunteers, or partners may have been the perpetrators of abuse, including sexual exploitation, we share these with the relevant authorities and bodies. These include 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, including concerns related to modern slavery, are recorded on our internal electronic incident-reporting tool. Introduced in 2016, the tool 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 can be found [here](#).

There have been no recorded reports of modern slavery in our supply chains. The British Red Cross views this as an incentive to roll out more training and to develop more rigorous processes to check for this rather than accepting this as confirmation that there is no slavery or exploitation in our supply chains. With this in mind, in 2022 we will be working on revising our incident-reporting tool to include capabilities for reporting modern slavery in supply chains specifically.

Prevention and response to sexual exploitation, abuse (PSEA)

The British Red Cross is committed to working with our Movement partners to develop a safeguarding culture in the interactions of all members of the IFRC network with people of all genders, ages and abilities in communities around the world.

With the IFRC, BRC led the development of the Global Safeguarding Action Plan for strengthening safeguarding in the IFRC network. This includes a particular focus on both PSEA and child safeguarding. It connects to modern slavery risks because it includes sexual exploitation and abuse perpetrated by humanitarian workers, who are often people in positions of authority.

The International Red Cross Red Crescent Movement (RCRC) is represented on the Cross-Sector Safeguarding Group (CSSG) by the British Red Cross. The Cross-Sector Safeguarding Group coordinated by the Foreign, Commonwealth and Development Office (FCDO) convened following the Safeguarding Summit in 2018. In 2019 the British Red Cross and DFID (now FCDO) published a pledge to prevent and respond to SEAH in humanitarian action at the 33rd International Conference of the Red Cross Red Crescent Movement (RCRC) in Geneva. This reiterated the Movement's long-standing commitment to preventing and responding to sexual exploitation and abuse. In 2020 and 2021 we reported on progress against this pledge in the Cross-Sector Safeguarding annual report, which is available [here](#).

The British Red Cross is committed to safety and inclusivity in all its work.

'Safe and Inclusive Programming' is an umbrella term that encompasses different areas of our work, including prevention of sexual abuse and exploitation (PSEA), community engagement and accountability (CEA), protection, gender and inclusion (PGI) mainstreaming (which includes addressing human trafficking and safeguarding) within any programme. The aim is for the five minimum actions for safe and inclusive programming to be integrated consistently into every community-facing programme we support.

These minimum actions relate to having a safe reporting process and response to feedback and complaints, referral pathways for child and adult survivors, two-way communications channels, inclusion of people of all genders, ages and ability, and assessment of risks to community members in relation to programme activities.

The British Red Cross is committed to employment cycle initiatives to help identify abusers and prevent sexual exploitation and abuse. All of our staff to be deployed overseas are Disclosure and Barring Service (DBS) checked or checked for a criminal record if non-UK residents 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.



Photo © Kate Stanworth/BRC

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 provides an introduction to identification and response to trafficking, and is aimed for all staff and volunteers. It was made available in 2015 on the International Federation of Red Cross and Red Crescent Societies (IFRC) learning platform, and in 2020 on the British Red Cross learning platform. As reported in the previous sections, 191 learners completed this e-module.

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.

As reported previously, in 2021, 58 learners completed e-module two, and we trained 78 people via remote learning.

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 in 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. This will 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 was updated in 2021 and is available to all of our people. This provides a reminder of the key 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.
- Guidance related to the British Red Cross' role in anti-trafficking reception centres following operations led by the authorities. A review of the guidance was completed in 2021 and an initiative to develop targeted tools to support with the delivery of key roles and responsibilities within the operation completed its first of two development phases.

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. The development of the e-module was led and funded 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 now available in Arabic, English, French and Spanish.

Working with a global group of staff from the Red Cross and Red Crescent Movement and in consultation with survivors of trafficking meant that the guidance is representative of current and context-specific approaches to supporting survivors of trafficking and trends in effective prevention activities. The British Red Cross hosted a series of webinars to launch and promote the e-module across different regions.

As previously reported, we continued to work with the IFRC and National Societies to strengthen knowledge and capacity at the local and regional level. Due to the ongoing challenges presented by the Covid-19 pandemic, we adapted and offered our training either face to face or through remote learning. We delivered training to a number of National Societies, including colleagues from the Ethiopian Red Cross. We also launched a guide and a toolkit to support National Societies in the Americas to implement a safe response to trafficking in the region.

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 2021 delivery pledges was to see reduced destitution and distress among displaced people. We also wanted displaced people to have increased access to protection and support to meet their basic needs and enable their long-term recovery.

The British Red Cross have been supporting survivors of trafficking and modern slavery since 2009. We work to make sure they are provided with the support they need to recover from their trauma, and are enabled to make informed choices about their futures. Anti-trafficking remains a core priority of our 2030 strategy.

Since 2015, the British Red Cross has increased its capacity to recognise and help people who have been trafficked. We've ensured all frontline staff and volunteers receive training to enable them to confidently respond to any signs of trafficking that they may come across and escalate their concerns to staff with specialist knowledge. In certain situations, the anti-trafficking team will then offer casework support tailored to the individual's needs.

In recent years, the British Red Cross has been at the forefront of strengthening the Movement-wide response to trafficking. We've worked 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 greater 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 2021, working to establish a workplace that is survivor-led, five directorates attended training on co-production approaches with survivors of trafficking and how this is enabled through having a trauma-informed workplace environment. This enabled us to host survivor student placements, which aims to help safeguard people against re-exploitation and foster survivor leadership in the anti-trafficking sector.

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 survivors of trafficking, and encouraging the sector to focus on protecting trafficked people and putting survivors 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 survivors to make their own informed choices, supporting them in the choices they make and enabling them to increase their resilience.
- Listening to survivors so that their expertise by experience shapes our services.

Safeguarding across our services

The British Red Cross requires that all safeguarding concerns are reported and investigated.

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

The majority of trafficking and modern slavery concerns were reported by our Refugee Support and Restoring Family Links (RSRFL) teams, and there were also some reports from crisis response and retail. The 32 cases (compared with 23 in 2020) reported represented 2.4% of the total safeguarding reports for the year (compared with 1.5% in 2020). There were a further 16 cases where the term 'trafficking' was referenced in the incident description. These are not captured here because they were reported under a different category or related to a child safeguarding concern.

Teams in the RSRFL directorate are asked to tick a box if the person they had a safeguarding concern about was also being supported by the British Red Cross anti-trafficking team. This box was ticked 44 times (compared with 32 in 2020).

These figures do not reflect the full organisational picture because:

- 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, physical 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 risk of underreporting of all safeguarding concerns across the organisation, which we are working to manage. Many of the cases will simply have been logged in a service's database (beneficiary relationship management system) reports and not added to our incident management tool.

- The anti-trafficking team does not record all of its cases through our incident management tool, 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

In 2021 our specialist anti-trafficking casework and support services delivered the following core services and operated a number of projects with restricted funds.

- 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, who were exiting the National Referral Mechanism (NRM) provision.

The report from the 'Sustainable integration of Trafficked human beings through proactive identification and Enhanced Protection' (STEP) project called 'Hope for the Future', can be found [here](#).

We continue to offer this model of support across all our delivery points. We delivered it through our Renew and Pathways projects, which both ended in 2020 and the FAST Project which started in 2021.

- 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 they 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.

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 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 expertise in the trafficking and asylum nexus, and how both these systems and experiences can impact people.



Photo © Kate Stanworth/BRC

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 and restore contact, 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 survivors of trafficking and exploitation 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. In 2019, we conducted an evaluation of this model of intervention and are working with authorities to improve it 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, mainstreaming it into other ongoing activities, or promoting 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. It 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 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 provides 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. It 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. These projects focus on building improved evidence of needs and solutions in order to inform advocacy on trafficking. More information about Red Cross projects can be found on our website [here](#).



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Using **our voice**: Advocating for improvements to the protection of survivors of trafficking

The goal of British Red Cross advocacy on 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 speak out about the risk factors and issues affecting people accessing the support they need. In 2021, we continued our work with the Home Office, bi-laterally and through various stakeholder groups, to raise these concerns and advocate for changes that would better support survivors. This included engaging with the consultation on the Home Office's New Plan for Immigration.

We continue to be members of the international and victim support subgroups of the Home Office Modern Slavery Unit's Modern Slavery Strategy Implementation Groups.

In 2021, we co-chaired 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. During 2021, the Network organised thematic webinars that have been widely attended by statutory and non-statutory organisations.

Advocating for long-term support for survivors

Our key focus in 2021 has been advocating for longer-term support for survivors of trafficking to recover and start to rebuild their lives in the UK. This was the focus of an essay by Sir Iain Duncan Smith in our essay collection to mark our 150th anniversary **Communities of humanitarian thought**.¹¹ During 2021, we worked with partners across the voluntary sector, with MPs and with members of the House of Lords to advocate for changes to the Nationality and Borders Bill that would provide both longer-term statutory support to all survivors of human trafficking and leave to remain for those with insecure immigration status.

Our advocacy builds on our previous research **Hope for the Future**,¹² which was published in 2019 and conducted in partnership with Hestia and Ashiana with co-funding from the Asylum, Migration and Integration Fund of the European Union. The research was based on experiences of over 70 survivors of trafficking and found that being recognised as a victim of trafficking in the UK does not come with support to help people to recover and rebuild their lives.

The research found that this lack of longer-term support leaves many people in vulnerable situations and at risk of re-exploitation. This also means that they are unable to support the authorities with investigations and give evidence about the exploitation they suffered. Survivors who do not have secure immigration status are particularly exposed to re-trafficking. They are not eligible for many forms of support and can be left facing homelessness, destitution and severe mental and physical health deterioration.

Working with voluntary sector partners, CARE and Justice and Care, we supported Sir Iain Duncan Smith MP to table amendments to the Nationality and Borders Bill. These amendments would provide 12 months of statutory support for recognised survivors of human trafficking and 12 months leave to remain for survivors with insecure immigration status. In response, the government has committed to introducing 12 months of individualised support for survivors of trafficking after a positive conclusive grounds decision through the UK's National Referral Mechanism. While the Nationality and Borders Bill was not amended to reflect this commitment, the Minister confirmed support would be introduced by amending statutory guidance.

In the year ahead, we will work to ensure that the UK government delivers on this vital commitment to ensure survivors of trafficking have the support they need to recover and rebuild their lives. We will continue to work with MPs and Peers to advocate for the introduction of leave to remain as a survivor of modern slavery for a minimum of 12 months.

In wider advocacy efforts on the Nationality and Borders Bill, we have continued to call for better support for survivors of trafficking immediately after they leave exploitation. We've also called for recognition that people need time, space and support before disclosing traumatic experiences and making decisions about their future. This includes advocating for the introduction of Places of Safety, to give survivors immediate accommodation and support in the days after leaving exploitation. This was a key recommendation from our 2020 report **First Steps to Safety?**¹³

¹¹ Communities of humanitarian thought: The case for change in a time of crisis.

[redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/communities-of-humanitarian-thought](https://www.redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/communities-of-humanitarian-thought)

¹² Hope for the Future: Support for survivors of trafficking after the National Referral Mechanism.

[redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/human-trafficking-and-slavery/after-the-national-referral-mechanism-report](https://www.redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/human-trafficking-and-slavery/after-the-national-referral-mechanism-report)

¹³ First Steps to Safety? The role of reception centres in supporting people out of exploitation.

[redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/human-trafficking-and-slavery/early-support-for-survivors-of-trafficking](https://www.redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/human-trafficking-and-slavery/early-support-for-survivors-of-trafficking)

Next steps

We will continue to build on these strands of our work. We have identified the following key priorities for 2022.

Overarching actions

We will:

- Continue to develop and improve our oversight of our work to eradicate the risk of modern slavery in our supply chains.
- Throughout 2022 we will continue to use Sedex to provide insights into high-risk areas and proactively engage with our key suppliers to use Sedex. This will address section 54(5) (d) of the Modern Slavery Act.
- In 2022 we will update our incident management tool to report on modern slavery in our supply chains.

Suppliers and partners

We will continue to:

- Consolidate suppliers, conduct checks and make sure suppliers sign up to our supplier code of conduct through our e-procurement platform and the 'new supplier creation' process.
- 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.
- Collaborate with counterparts in other charities via the Charity Sector Procurement Group, in order to gain more insight across the sector.
- 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 2022, under the Safeguarding Director appointed in 2021.

Training

We will:

- Promote further completion of e-module 1 across the organisation; seek further completion of e-module 2 among frontline caseworkers; and continue to deliver Module 2 training sessions to frontline caseworkers via virtual classrooms.
- Continue to monitor completion of mandatory training on our code of conduct, safeguarding, data matters, equality, diversity and inclusion, and health and safety by all staff and volunteers.
- Continue to actively roll out the global e-module 'Understanding and Responding to Trafficking in Persons' in English, French, Spanish and Arabic. Monitor completion of the e-module in the four available languages.

Anti-trafficking programmes

We will continue to:

- Monitor the UK context to identify new and emerging needs, and seek to evolve our services to meet those needs.
- Develop strong partnerships across the anti-trafficking sector.
- Champion anti-trafficking work across the International Red Cross and Red Crescent Movement.