

Modern Slavery Statement

The 2022 statement from the British Red Cross

At the British Red Cross, our vision is of a world where everyone gets the help they need in a crisis. Our aim is to mobilise the power of humanity so that individuals and communities can prepare for, deal with and recover from emergencies. Just over 12,000 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 mission 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. It has 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 principles¹ that guide everything we do.

The British Red Cross, like other Red Cross and Red Crescent National Societies,² 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.³ This gives the British Red Cross a unique legal status. It is a private organisation with certain recognised public functions. And 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. This provides a unique opportunity to build a relationship between a National Society and its government. While it is an auxiliary to His Majesty's Government, the British Red Cross is required to maintain its autonomy so that it can act in accordance with its fundamental principles.⁴

Our anti-slavery commitment

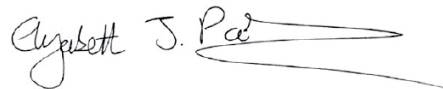
We are committed to recognising and responding to trafficking and other forms of modern slavery, both where we encounter it in our supply chains and as a key part of our service operations. As part of this dual commitment, we support people in crisis through our anti-trafficking work and safeguarding 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. Our anti-trafficking work aims to ensure that any adult or child who is trafficked or exploited will be recognised, supported and protected. Each year, we support tens of thousands of people through our services across the UK. In 2022, that included 132 adults and children who have experienced trafficking. We are continuing to expand this work in 2023 across our UK and overseas operations.

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 2022. Building on our statements from previous years, this statement highlights new developments and important initiatives we have taken in 2022. All of our work connected to reducing the risk of modern slavery in our supply chains is led by the Modern Slavery in Supply Chains working group. This group consists of management-level representatives from all the teams involved in working on our continuous improvement plan including Procurement, Corporate Governance and Workforce Policy. This group meets once a quarter to discuss actions relevant to the continuous improvement plan, and carries out actions throughout the year related to identifying and mitigating the risks of modern slavery across our organisation.

This statement was approved by the board of trustees at its meeting on 18 April 2023.

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



Mike Adamson, chief executive officer



Clive MacTavish, interim chief finance officer
(on behalf of Britcross Limited)



¹ 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)

² 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)

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

⁴ Statutes of the International Red Cross and Red Crescent Movement, Preamble, Principle of Independence.

Our governance structure

The British Red Cross has its head office in London.
In 2022, our total annual income was over £430 million.⁵

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. It 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 oversees our ethical fundraising procedure and decides on all significant donations, partnerships, sponsorships and gifts in kind.

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.

The Modern Slavery in Supply Chains working group is connected to the ELT through a named ELT sponsor, in order to oversee the work carried out through the workplan and the risks being identified and mitigated. The board signs-off the annual Modern Slavery Statement.

The British Red Cross operates in nine British overseas territories. The Bermuda Red Cross, the Cayman Islands Red Cross, the British Virgin Islands Red Cross and the Turks and Caicos Islands Red Cross are locally incorporated and accounted for as subsidiaries. The Anguilla 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.

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 our activities, including those of Britcross Limited.

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⁵ Over £430 million is our total income, and not our net income. 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

The British Red Cross has one procurement and purchasing policy that takes account of Modern Slavery risks and the Modern Slavery Act. This applies to and 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. Both of these teams work together to manage suppliers. The supply base for goods and services for our UK-based programmes has a high ratio of repetitive orders with the same suppliers. The supply base relating to international operations has a majority of one-off suppliers and issues new tenders for each supply requirement.

Since the end of 2018, confirming compliance with the BRC Supplier Code of Conduct (CoC) has been part of the onboarding process for all new key suppliers for the UK. Every supplier submitting a bid against a tender is now required to sign our Supplier CoC as a component of the tendering procedure. This CoC requires suppliers to confirm they uphold the Modern Slavery Act, and that they are taking measures to ensure there is no modern slavery in any aspect of their supply chain. Our gateway system will not allow a new supplier to be registered

without a signed Supplier CoC. If a potential supplier will not sign our CoC, in exceptional circumstances, they will be asked to provide a copy of their own for review by our legal team.

Our selection criteria for key suppliers above a given threshold requires us to look at our existing supply chain across our UK operations, as outlined in our Decision Making Matrix, and consider full life contract value, and risk areas. Key suppliers must provide 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 continue to collaborate with counterparts in other charities via the Charity Sector Procurement Group, in order to gain more insight across the sector. We are also engaging with stakeholders across the Red Cross Red Crescent international Movement – which includes National Societies, the International Federation of the Red Cross, and the International Committee of the Red Cross – to develop consistent approaches and coordination through a common approach to supplier due diligence.



Photo © Marko Kokic/IFRC

Identifying risks in our supply chains, mitigation measures and progress against measures

Risk area	Mitigation	Progress
Existing property landlords have not yet been required to sign the supplier code of conduct in the same way that all other key suppliers have.	We continue to ask landlords to sign our supplier code of conduct at the point of new leases or renewal.	Over 80% landlords have signed the supplier code of conduct. 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. We are reviewing this process in 2023.
We manage a high number of suppliers, which makes it difficult to manage and oversee due diligence	Since 2019 we have been working on our supplier consolidation project, drastically reducing our overall number of suppliers.	We continue to work on supplier consolidation to have better control of our supply chains. 2022 saw a further 30% reduction in supplier numbers compared with the previous year.
We currently rely on supplier self-certification as our mode of due diligence for all our suppliers.	We will seek to use Sedex ⁶ as one way to go beyond supplier self-certification, and explore other ways to do this.	The Procurement Team continued to onboard suppliers to Sedex, and use the tool to assess their risk level in respect of modern slavery. Supplier membership of Sedex is voluntary so we do not use Sedex for every supplier. The Procurement Team will continue to collaborate with Sedex experts to maximise the number of our suppliers that become members, particularly the suppliers in high-risk areas.
We currently manage our supply chains at 'tier 1' level, which are the suppliers we engage with directly.	We require all suppliers with supply chains that represent a particular risk to submit evidence of the work they are doing to manage those supply chains in relation to modern slavery. We require key suppliers to provide evidence of the action they are taking to manage their own overseas suppliers.	We continued to require suppliers to provide the relevant evidence of these things as part of our onboarding processes. One element is the Supplier Relationship Management (SRM) section on the procurement platform that will be rolled out in 2024.
We receive donations and requests for partnerships from a wide range of organisations, and this requires scrutiny of their supply chains.	As part of our due diligence, we check if a company or private donor has its own Modern Slavery statement, and flag any accusations, press coverage and lawsuits connected to modern slavery, regardless of having a modern slavery statement.	All significant donations, partnerships, sponsorships and gifts in kind continue to be screened. We did not identify any modern slavery issues during this process in 2022 and therefore did not decline any opportunities on this basis.
More focus needs to be given to our partnerships and the organisations we provide grants to, particularly overseas, beyond the prevention of 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.	Our work on this continued in 2022, and will remain ongoing throughout 2023.
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 will target specific teams to complete our Recognising and Responding to Human Trafficking e-module to help them understand trafficking, recognise the signs and respond safely and appropriately.	A total of 612 people in the British Red Cross completed our e-module in 2022. 100% of the personnel within the following critical teams have completed the training and it is included in the induction requirements for all new team members; <ul style="list-style-type: none"> - purchasing and procurement - international logistics - professional services, internal audit and health safety and security

Any member of the public can make a complaint or raise a concern at any time. Information on how to do so can be found on our website: redcross.org.uk/feedback

⁶ 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

⁷ 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.

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

Key progress in 2022

- In 2022, our Code of Conduct was reviewed and updated to make the expectations we have of our people clearer, increase the emphasis on how to report suspected or actual incidents and concerns, and ensure the various routes through which to raise issues are clear. The code confirms that we have zero-tolerance for exploitation – including sexual exploitation – abuse or violence. The accompanying training module, which was revised in 2021 to increase the emphasis on our reporting channels, forms part of the mandatory training for all our staff, including contractors, consultants and volunteers.

- By the end of 2022, the Code of Conduct training had been completed by every member of the board, executive leadership team and governance team, 4,280 of 4,505 staff members and 6,550 of 10,077 volunteers, representing:

- 95% of staff, compared to 93% in 2021

- 65% of volunteers, compared to 45% in 2021

- In 2022, a new **Dignity at Work Policy** and supporting procedure was put in place. The policy aims to ensure everyone is aware of the standards of behaviour expected of them, so that all of our people and beneficiaries are treated with dignity and respect. It also provides a clear framework to ensure that complaints of unacceptable behaviour are dealt with promptly and fairly. Further, it aims to help develop and maintain a safe and healthy working environment in which any form of disrespect, favouritism, harassment, bullying, discrimination and victimisation is unacceptable.

- Following a **review of our Casual Worker Model** in the second half of 2022, a staff survey will be sent to all existing casual workers in 2023 to seek their views on a wide variety of issues, including working with the British Red Cross, pay and benefits. The results of this survey will help inform the work of the Casual Worker Review Working Group, as it strives to ensure that our policies concerning casual workers are fair and consistent, and that casual workers are rewarded for the excellent work they do for our organisation and service users.

For the list of all our relevant policies, please refer to [Annex I](#)

Safeguarding

Safeguarding at the British Red Cross is how we prevent and respond to concerns of abuse, exploitation and harm to children, adults and communities who come into contact with us or our partners.

Key progress in 2022

- We updated our internal incident management and reporting system, enabling us to more accurately report, track and respond to concerns of trafficking and modern slavery. The new system has particularly improved our oversight of concerns raised internationally.

- Our anti-trafficking and safeguarding teams continue to work closely together to share expertise with each other and the wider organisation. In 2022, this expertise-sharing has been facilitated by joint casework meetings, peer reviews and partnership working.

- We recruited a Migration Safeguarding Specialist, who will improve the anti-trafficking safeguards in our Family Reunion work. The role will focus on the reunification of Ukrainian children but will also provide more widespread support across our Restoring Family Links and Anti-trafficking workstreams.

- We deployed a team member to the Ukraine response as the IFRC's first ever dedicated safeguarding delegate. The delegate coordinated with partners to identify safeguarding risks and helped integrate safeguarding minimum standards. This included providing training to the Ukrainian and Hungarian Red Cross societies and raising awareness of the trafficking risks for internally displaced Ukrainians and refugees in neighbouring countries.

- We are establishing a safeguarding register to bolster safeguarding in future emergency operations. It will identify a pool of safeguarding professionals ready to deploy at short notice to conduct safeguarding activities in an emergency response, as well as provide surge support in non-emergency contexts.

- We provided safeguarding guidance to government departments working on various migration-related programmes, policies and emergencies, including the Afghan Relocations and Assistance Policy, English Channel crossings and Ukraine.

- Operational teams were supported to significantly increase their engagement with mandatory and core safeguarding training, including of modern slavery awareness. Rates of volunteer engagement on mandatory safeguarding training doubled and staff core safeguarding completion rates rose from 10% at the beginning of the year to 70% by the end.

- We updated the responsibilities for our safeguarding lead with the board of trustees and appointed a new representative.

- We restructured the team to increase safeguarding development capacity.

- We consulted with key internal stakeholders to further strengthen our safeguarding policy, which will be updated in 2023.

- Implemented the inter-agency misconduct disclosure scheme in the International Directorate. We are also actively working with other agencies to support the development of employment cycle initiatives, including the Aid Worker Passport/ Registration Scheme and Project Soteria, an Interpol project aimed at preventing perpetrators of sexual exploitation, abuse and harassment from working in the aid sector.

Our Safeguarding Advice Team provided support and guidance on 72 concerns of modern slavery, reported by operational teams across the organisation. These 72 concerns related to our service delivery, so mainly concerned clients or service users. As well as this organisation-wide reporting, the Safeguarding Advice Team provided our Anti-trafficking caseworkers with support for a further 21 incidents of abuse and welfare concerns involving individuals supported by our anti-trafficking teams. These concerns included a broad range of issues such as suicide ideation and attempts, domestic abuse and discrimination. We report our holistic safeguarding responses in our annual trustee's report and accounts. More information can be found [here](#)⁸.

⁸ <https://www.redcross.org.uk/about-us/how-we-are-run/our-finances/annual-reports-and-accounts>

Training and guidance for our people

Key progress in 2022

- An introductory module to anti-trafficking was adapted and delivered by the British Red Cross to external organisations in the UK as part of the European Commission-funded FAST project. A total of 26 learners from three different organisations attended remote training on how to recognise and respond to trafficking.

- We began updating the introductory module for internal staff and volunteers, to ensure it remains up to date and relevant. We also want to include examples of trafficking in times of emergency. The revised training will launch in 2023.

- We targeted the introductory module to key teams in higher-risk areas of the organisation. In 2022, a total of 612 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 for British Red Cross Refugee Support teams providing casework support. In 2022, a total of 75 people completed online training in anti-trafficking casework skills. We also continued to deliver our casework skills training – training 29 people using this approach.

- In partnership with the Australian Red Cross and the IFRC, we continued to support the roll-out of a global e-module on human trafficking: 'Understanding and Responding to Trafficking in Persons'. It aims to improve the ability of Red Cross and Red Crescent staff and volunteers to recognise and respond to trafficking. In 2022, 157 people completed this training.

- We started updating our child trafficking guidance for internal use, and worked with partners to develop guidance on the rights and entitlements of survivors of trafficking. Both of these will be released in 2023.

Please note that 2022 completion figures for e-module 1, e-module 2 and module 2 remote classroom training may include some learners who have previously completed the training.

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 by which they can 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 at all staff and volunteers.

Module 2 is specifically aimed at refugee support service caseworkers. This blended learning package provides additional information and advice about how to address the needs of trafficked people and help them to navigate often very complex systems. Our independence and neutrality, which are two of our fundamental principles, help us to provide non-directive information, enabling people to make their own informed choices.

International mandatory training:

All our international staff are required to complete broader training, which supports:

- awareness of expected standards of behaviour, including the 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. It includes an introduction to safeguarding; an introduction to protection from sexual exploitation, abuse and harassment; child protection in the IFRC; and principles and rules for Red Cross and Red Crescent humanitarian assistance.

Guidance

We acknowledge that clear frameworks will enable our people to respond consistently and appropriately if they are concerned about human trafficking. To support our frontline staff, 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 help trafficked people make their next steps.
- Our anti-trafficking pocket guide, which was updated in 2021 and is available to all our people. This provides a reminder of the key indicators of trafficking, and the colleagues they should contact if they need to raise a concern.
- Specific guidance on 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 help deliver key roles and responsibilities within the operation completed its first of two development phases.
- Child trafficking guidance for refugee support and anti-trafficking caseworkers to help respond to the specific needs of children, which will be released in 2023.
- Guidance on the legal rights and entitlements of survivors of trafficking, for internal and external caseworkers, which will be released in 2023.

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.

Movement-wide training module

The e-module 'Understanding and Responding to Trafficking in Persons' was developed in 2020. It provides an introduction to trafficking for International 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 increase the ability 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 ensures that the guidance represents current and context-specific approaches to supporting trafficking survivors, as well as trends in effective prevention activities.

We continued to work with the IFRC and National Societies to strengthen knowledge and capacity at the local and regional level. During 2022 we delivered training to a number of National Societies, including colleagues from the Ethiopian Red Cross and the Libyan Red Crescent. We also launched a guide and toolkit to support National Societies in the Americas to implement a safe response to trafficking in the region.

Next steps

We will continue to build on these strands of our work. We have identified the following key priorities for 2023.

We will:

- Continue to develop and improve oversight of our work to minimise the risk of modern slavery in our supply chains.
- Use Sedex to provide insights into high-risk areas and proactively engage with our key suppliers to ensure they also use Sedex.
- Increase awareness of our internal reporting tools for reporting modern slavery in our supply chains among our staff and volunteers.
- Continue to consolidate suppliers and make sure they sign up to our Supplier Code of Conduct through our e-procurement platform and the 'new supplier creation' process.
- Continue to develop methods to address the risks identified in our procurement processes and explore ways to move beyond reliance on self-certification and tier 1 due diligence.
- Continue to collaborate with our counterparts in other charities via the Charity Sector Procurement Group, to gain more insight across the sector.
- Build on our work with the IFRC to develop a movement-wide approach to procurement.
- Work with our British Red Cross, and wider Red Cross Red Crescent international Movement colleagues to investigate areas where we could enhance our due diligence procedures.
- Continue to strengthen our safeguarding visibility across the UK and internationally, and begin to embed our new Safeguarding Strategy Group to use our additional development capacity.
- 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. And monitor completion of the e-module in these four languages.
- Launch an update to e-module 1 to include more information about trafficking in the context of humanitarian emergencies, such as the conflict in Ukraine.
- 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.
- Continue to use our evidence to advocate for improvements to the standards of care and support available to survivors of human trafficking, drawing specific attention to the needs of survivors of trafficking who are also in the asylum system.

Annex I

Responding through our operations

Policies and procedures, and related training, are instrumental to achieving our strategy to support people in crisis, including those experiencing modern slavery and human trafficking. They also help ensure our work meets clear internal and external standards. We have a well-established and comprehensive corporate policy framework 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 Modern Slavery Act was first introduced, we reviewed and updated key policies, procedures and corporate documents, including our handbook for staff and related training modules. We also ensured our policy on raising a concern (whistleblowing) covered modern slavery risks, and our commitment to maintaining the highest standards of conduct and ethical behaviour.

Policy/Procedure	Details	Last updated or reviewed
British Red Cross Code of Conduct	Applies to all staff and volunteers. States clearly that we have zero-tolerance for any kind of exploitation, abuse or violence. Requires that any breach is reported and provides details on how to do so.	Last reviewed April 2022. Next review due April 2025.
Employee Handbook	Applies to all staff. Sets out our expectations for ethical behaviour and our commitment to ensuring the effective prevention of slavery and human trafficking in both our supply chains and corporate activities.	Last updated in November 2022.
Procurement and Purchasing Policy	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. Next review due June 2023.
Raising a Concern Policy and Procedure	Applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, delegates and interns based in the UK or overseas. Sets out the expectation that our people will speak up when they observe or suspect wrongdoing and the process for reporting concerns, including how to do so anonymously. Reportable concerns include those involving our supply chains and/or any circumstances that may give rise to increased risk of slavery or human trafficking.	Last reviewed May 2021. Next review due May 2024.
Recruitment and Selection of Staff Procedure (including agency workers)	Details the expectation that recruitment and selection is conducted in accordance with the highest ethical standards and in compliance with employment and equality legislation.	Last reviewed November 2022. Next review due November 2023.

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Policy/Procedure	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	Sets out how we fulfil our obligations and handle concerns about safeguarding children and adults who are (or are at risk of) being abused. This includes risks associated with modern slavery and trafficking, which are cited as two of our key safeguarding concerns.	Last reviewed December 2020. Next review due December 2023
Transparency and Accountability Policy	Details how we will publish information on 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 our Modern Slavery Statement annually on our website.	Last reviewed May 2022. Next review due May 2025.
Incident Reporting Policy and Procedure	Sets out our expectation that any incidents – including those concerning the safety of our people and beneficiaries, and slavery in our supply chains – will be reported and investigated.	Last reviewed September 2021. Next review due November 2023.
Ethical Policy	Sets out our expectation that, when initiating significant new activities and/or partnerships, decisions will be informed by applying best practice due diligence assessments to ensure they meet both our charitable objectives and ethical standards.	Last reviewed January 2021. Next review due January 2024
Professional Boundaries Procedure	Details the requirement that relationships between those who use our services and the Red Cross staff and volunteers who deliver them are appropriately established and maintained. To ensure parties neither become overly familiar nor fail to take into account the power differences within professional relationships, professional boundaries protect all parties and ensure our service users receive accessible services and are treated with respect and dignity at all times.	Last reviewed February 2020. Next review due February 2023.
Dignity at Work	Sets out the standards of behaviour expected from staff and volunteers, so that all of our people and our beneficiaries are treated with dignity and respect. It also provides a clear framework to ensure that complaints of unacceptable behaviour are dealt with promptly and fairly. It aims to help develop and maintain a safe and healthy working environment in which any form of disrespect, favouritism, harassment, bullying, discrimination or victimisation is unacceptable.	Launched in August 2022.

Annex II

Responding through our operations

In recognition of our commitment to supporting people in crisis through our anti-trafficking work, one of our key 2022 delivery pledges is to ensure that people who have experienced sexual and gender-based violence, trafficking and/or exploitation have access to protection and support that meets their needs and enables their recovery.

We believe that providing the right information at the right time to survivors of trafficking enables them to make informed choices about their future. 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. Anti-trafficking remains a core priority of our 2030 strategy.

Through our training and guidance, we have worked to ensure all frontline staff and volunteers are able to confidently respond to any signs of trafficking they 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 International Red Cross and Red Crescent Movement staff and volunteers across the world to build capacity and develop projects that take into account the unique vulnerabilities of trafficked people.

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 the UK, our volunteers and staff work alongside civil society, the police and local authorities to help people who have been trafficked. Our response features 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 help 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.

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 also run as standalone specific programmes.

Specialist trafficking support in the UK

In 2022 our specialist anti-trafficking casework and support services operated a number of projects with restricted funds and delivered the following core services.

- Longer term support

In 2019, we delivered and concluded an integration pilot in collaboration with Hestia and Ashiana. The 'Sustainable integration of Trafficked human beings through proactive identification and Enhanced Protection' (STEP) project used 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, 'Hope for the Future', can be found [here](#).

We continue to offer this model of support across all our delivery points. In 2022, we also delivered it through our European Commission funded FAST Project which started in 2021.

- Support to people who are outside 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

We provide advice to internal colleagues responding to trafficking in the UK, enabling them to respond appropriately and sensitively.

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 who 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.

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 set up reception centres for survivors of trafficking and exploitation when local police or the National Crime Agency conduct anti-trafficking operations. These are open 24 hours a day for a short-term period, and offer emergency provisions, such as food, clothes and blankets, as well as 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' capabilities 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. This support to the Movement is now part of our core offer.

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 the target audience and identified needs. Our work is guided by context-specific requirements, gaps and capabilities identified by or together with other National Societies.

We are currently engaging with multiple National Societies and the International Federation of Red Cross and Red Crescent Societies (IFRC) in different regions. We have been working closely with Movement components in the Middle East and North Africa, Europe, the Americas and Africa to share learning and promote interventions aimed at reducing risks, and responding to trafficking in migration and displacement contexts, in line with the British Red Cross 2030 strategy.

The British Red Cross was early to recognise the significant risk of trafficking caused by the escalation of conflict in Ukraine. Internally displaced persons and people in areas of conflict, as well as those fleeing across international borders, face additional risks of exploitation. Particular groups,

including unaccompanied children, older people, people with disabilities and minority groups (including third country nationals who were in Ukraine, Roma people and LGBTQI+ people) are particularly at risk. As a result, the British Red Cross scaled up efforts to support the IFRC and impacted National Societies to better understand the risk and to put into place adequate prevention and response activities. This includes training staff and volunteers, contextualising information to be shared with communities, ensuring safe referrals are in place and coordinating all efforts with other agencies working on such issues in the region. Meanwhile in the UK, frontline staff continue work that helps Ukrainians and others arriving in the UK to stay safe and access specific support related to exploitation and trafficking.

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 are co-chairs of 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 chaired the annual meeting of more than 10 Movement and external migration actors in October 2022.

We are members of the International Anti-Human-Trafficking Network (IAHTN). The network maintains relationships between international and national anti-trafficking organisations to enable us to collaborate, share best practice, and advocate for development in the sector with a one amplified voice.

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), 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.

At the Movement's 2015 international 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](#).

Annex III

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

The British Red Cross advocates for fewer people to be exploited, and for survivors of trafficking 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 draw on our operational insight and speak out about the risk factors and issues affecting people accessing the support they need. In 2022, we continued our work with the Home Office, bi-laterally and through various stakeholder groups, to raise these concerns and advocate for changes to better support survivors.

We are members of the international and victim support subgroups of the Home Office Modern Slavery Unit's Modern Slavery Strategy Implementation Groups. It has been a challenging year to advocate for the support we know is needed to people at risk of and experiencing modern slavery. The rhetoric has often involved reference to the modern slavery system being 'abused', which has made it challenging to engage the Home Office on the need for improved support for survivors.

At risk: exploitation and the UK asylum system

Our key focus in 2022 has been the development and publication of a joint report with the UNHCR highlighting exploitation, and the risks of exploitation, in the UK asylum system. Our research found that people seeking asylum in the UK are at risk of exploitation or have been exploited in the UK. Fieldwork took place between February and October 2021, involving interviews and focus groups with a range of contributors. They included 18 people with lived experience of seeking asylum and/or who had experiences of, or were vulnerable to, exploitation.

The research found that people seeking asylum in the UK have felt unsafe, unable to disclose experiences of human trafficking or have been forced into domestic servitude, sexual and labour exploitation, and forced criminality. It also found that opportunities to identify and address risks are frequently missed throughout the asylum system, due to an over-reliance on people self-identifying as victims of human trafficking and a lack of effective vulnerability screening at all stages of the asylum process. The risks of exploitation are also exacerbated by government policies and practices, such as requirements for potential victims of modern slavery to report to immigration enforcement at the same time and place, failure to provide safe-house accommodation, and policies that increase risks of destitution and homelessness.

We launched the report in August 2022 and secured media coverage on the BBC Radio 4 Today programme and elsewhere. Ahead of the report's publication, we held a trilateral meeting of the Home Office, the British Red Cross and the UNHCR, with senior Home Office officials, including the Modern Slavery Unit, in attendance. We shared key findings from the research and agreed ways of working together to take forward the recommendations. It was agreed that a working group would be set up with representatives from the Home Office Asylum Operations and Policy team, the British Red Cross and the UNHCR to continue to discuss the recommendations from the report. Unfortunately, it has been challenging to establish this working group due to difficulties in continuing to engage the Home Office, and in particular the Modern Slavery Unit. We are continuing to work closely with the UNHCR to do so.

At the end of 2021, the government 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 Act does not reflect this commitment, the Minister confirmed support would be introduced by amending statutory guidance, but this has not yet happened. In October 2022, the brief for modern slavery was moved from the Minister for Safeguarding to the Minister for Immigration under the section "illegal immigration and asylum". We do not believe that modern slavery is an immigration issue, and so are very concerned by this move. UK nationals are the second highest nationality group referred to the NRM, and over half of the exploitation that leads people to be referred to the NRM takes place in the UK. We believe that the focus should be on protecting those who are at risk and providing the right support to survivors.

We worked with the Guardian newspaper to draw attention to this change, with a quote from the British Red Cross' Head of Policy. In December 2022, the Cabinet Office published a list of ministerial responsibilities, which clarified that 'abuse of the modern slavery system' was a responsibility of the Minister for Immigration, while 'wider policy and safeguarding' relating to modern slavery was the responsibility of the Minister for Safeguarding.

In the year ahead, we are expecting the Illegal Immigration Bill. Much like the Nationality and Borders Act, we anticipate it will include sections on modern slavery. We will work with partners in the sector to advocate for better support for survivors of trafficking immediately after they leave exploitation, and the introduction of places of safety, to give survivors immediate accommodation and support in the days after leaving exploitation.

¹⁰ Home Office reclassifies modern slavery as illegal immigration issue | Slavery | The Guardian

¹¹ 2022-12-15 - List of Ministerial Responsibilities_final for publication.docx (publishing.service.gov.uk)

Where we are

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