



**BritishRedCross**



# THE MODERN SLAVERY ACT

A statement from the British Red Cross

**Refusing to ignore people in crisis**

## Introduction

At the British Red Cross, our vision is of a world where everyone gets the help they need in a crisis. Our mission is to mobilise the power of humanity so that individuals and communities can prepare for, deal with and recover from crises. More than 20,500 volunteers and 4,000 staff work together to fulfill our vision and mission, both in the United Kingdom and overseas.

We help hundreds of thousands of people cope with all kinds of crises – from disasters and conflicts to individual injuries and other personal challenges. Our work includes support in emergencies, refugee support, independent living services, first aid, and humanitarian education. The combined effect is to help both individuals and communities prepare for, cope with and recover from a range of crises.

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

- > The International Committee of the Red Cross (ICRC);
- > The International Federation of Red Cross and Red Crescent Societies (IFRC); and
- > 190 National Red Cross and Red Crescent Societies around the world, including the British Red Cross.

As part of our membership of the Movement, the British Red Cross is committed to and legally bound by its seven Fundamental Principles (humanity, impartiality, neutrality, independence, universality, voluntary service and unity). The Fundamental Principles guide all that we do.

## The Modern Slavery Act



As a humanitarian organisation, our aim is to always prevent and alleviate human suffering in the UK and throughout the world, to protect life and health, and ensure respect and dignity for all people.

On that basis we welcome the introduction of the Modern Slavery Act 2015 (the Act), which entered into force on 29 October 2015. Pursuant to section 54(1) of the Act, this document fulfills our reporting obligation to provide a slavery and human trafficking statement covering activities for the financial year ending 31 December 2016.

We use definitions more widely used in the sector, namely that modern slavery encompasses sexual and criminal exploitation; forced labour and domestic servitude. Individuals who are victims of modern slavery may have been trafficked.

A victim of human trafficking will have been moved through force, coercion or deception in order to be exploited. Even if the individual agrees to the movement, and/or escapes before the exploitation has taken place, they may still be a victim of human trafficking. At the British Red Cross, we use the term 'anti-trafficking' to encompass all of our work in relation to modern slavery.

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

A handwritten signature in black ink, appearing to read 'David Bernstein', with a long horizontal flourish extending to the right.

**David Bernstein**

Chair, Board of Trustees  
April 2017

## Our Governance

The British Red Cross has its head office in London. In 2016, our total annual income was £251.7 million.

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

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

The board is made up of 14 members: eight members elected by and from active volunteers; and up to six co-opted members who are appointed by the board, including the roles of chair and treasurer.

The board's role and functions are laid out in our Royal Charter, and supplemented by Standing Orders which set out our rules of governance. The board meets four times a year, and is supported by committees working with delegated decision making authority in specific areas (emblem; ethical fundraising and quality assurance; finance and audit; governance and nominations; health, safety and security; investment; remuneration; service quality and assurance).

The executive leadership team (ELT) is responsible for the day to day management

of the organisation, and is led by the chief executive. It meets once a month. The chief executive works closely with the board to agree a clear direction for the organisation and supports ELT to give effect to that direction and be accountable for its delivery.

Together the board and ELT approve and oversee the implementation of our corporate strategy. Our 2015-2019 corporate strategy is refusing to ignore people in crisis. The board and ELT also manage the governance of the organisation through policies and procedures, which set out a clear framework for our activities and services.

## Our policies

Policies and procedures are instrumental to achieving our strategy to support people in crisis, as well as to ensure that the work we do meets clear internal and external standards. Updates to our policies and procedures are signed off by the board and/or ELT.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our operations. Following the introduction of the Act, we have reviewed a number of our corporate policies and made enhancements to them to ensure the specific risk of modern slavery and anti-trafficking has been captured and our people are aware of their responsibilities under the Act. As part of this work, the following policies and corporate materials have been updated:

> Employee Handbook

- › The organisation makes clear to employees the actions and behaviour expected of them when representing the organisation through the Employee Handbook which is made available for all staff.
- › We strive to maintain the highest standards of employee conduct and ethical behaviour when operating both in the UK and abroad. The Employee Handbook includes reference to management of our supply chains, stating our commitment to preventing slavery and human trafficking in our corporate activities and to ensuring our supply chains are free from slavery and human trafficking.

> Procurement and purchasing policy

- › This policy confirms that robust due diligence is undertaken to ensure that our procurement and purchasing activities are performed in line with our commitment to ethical purchasing and the Act.
- › We require our suppliers to certify that they comply with the Act as part of their tender responses; all suppliers are required to self-certify that they audit their supply chains; and we incorporate a specific clause within our terms and conditions in relation to modern slavery.
- › The updated policy was approved by ELT in July 2016.

> Raising a Concern policy and procedure

- › This policy sets out how the organisation encourages all its employees, volunteers, service users and stakeholders to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- › The policy confirms that individuals will not be at risk of suffering any form of reprisal as a result of raising a concern under this system. We also affirm our organisational position that harassment or victimisation of anyone raising a concern will not be tolerated.
- › The Raising a Concern procedure is designed to make it easy for anyone to make disclosures, and to find out where to get external advice.
- › The updated policy refers to the Act and was approved by ELT in September 2016.

> Recruitment and selection policy (including agency workers)

- › This policy confirms that the organisation uses only specified, reputable employment agencies to recruit staff and always verifies the practices of any new agency we use before accepting workers from that agency, ensuring they meet the requirements of the British Red Cross Preferred Suppliers List.
- › The updated policy refers to the Act and was approved by ELT in July 2016.

- > Safeguarding adults, children and young people policies and procedures
  - › Both our safeguarding adults at risk of harm and abuse, and our safeguarding children and young people policies and procedures set out how we fulfil our safeguarding obligations. This includes people to whom we provide services, staff and volunteers who need to be safeguarded, and customers with whom we interact in our retail shops.
  - › The procedures provide information about how to handle a concern about an adult, child or young person at risk – including the risks of modern slavery and trafficking – and make reference to how they can contact colleagues to seek support and guidance.
  - › Modern slavery and trafficking is listed as one of our key safeguarding concerns. In addition, we have internal guidance that details an internal referral pathway to the anti-trafficking team if concerns are reported to us.
  - › The updated policies refer to the Act and were approved by the board in December 2016.
  
- > Transparency and Accountability policy
  - › Given the interest of stakeholders in evaluating our delivery of services to people in crisis and to promote a climate of greater transparency, we have sought to identify key documents and reports with a view to enable assessments to be made about our operations and performance.
  - › As a general principle we will endeavour to release information in the interests of transparency unless there is a good reason for us not to do so. Examples of when we would not release information would be if it would jeopardise the safety and security of our people, those who use our services or our operations; breach legal or confidentiality requirements; or cause detriment to our operations on commercial sensitivity grounds.
  - › Consistent with the obligations of the Act, the transparency and accountability policy includes our commitment to publish this statement annually on our website, as well as to provide a copy on request to interested parties.
  - › The new policy refers to the Act and was approved by the board in September 2016.

## Responding through services

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

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

Since 2014 we have been training our frontline staff and volunteers to recognise and help trafficked people through the PROTECT (Persons at risk of trafficking in Europe: Capacity to identify and assist potential victims of human trafficking) project. PROTECT was funded through the Prevention of and Fight against Crime

programme of the European Union (ISEC), with the objective of building the Movement's response to trafficking by developing internally focused training and the required systems to provide assistance to victims of trafficking, to empower them to enact their rights and to make informed decisions.

## Training and guidance

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

Through the PROTECT project we developed two specific training modules:

- > Module 1 which we made available on the IFRC learning platform for the IFRC and all 190 National Red Cross and Red Crescent Societies. Module 1 provides a basic introduction to trafficking and is designed for all staff and volunteers to complete. We commenced roll out of the training in 2015.
- > Module 2 which is specifically aimed at refugee support caseworkers. This provides additional information and advice about how to specifically address the needs of trafficked people and help them to navigate often very complex systems. Our independence and neutrality helps us to provide non-directive information enabling people to make their own informed choice.
- > We are also working to develop more bespoke training specifically targeting safeguarding officers to ensure they are aware of appropriate steps to take should a trafficking case be reported through our safeguarding channels. In addition we are working on other bespoke training for different roles within our organisation.

Moving forward, we will continue to roll out these training modules and use embedded learning techniques to ensure that all of our people who wear the Red Cross are aware of the signs of trafficking and understand the internal referral pathway.

In 2016 we also partnered with Forum Refugies (France) who are leading on the TRACKS (identification of TRafficked Asylum seeKers' Special needs) project and we share some further information about this below. The TRACKS project will offer capacity building sessions and a toolbox to help frontline practitioners (both internal and external to the British Red Cross) to identify the specific needs of trafficked people within the asylum system.

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

- > The caseworker field guide, which is specifically tailored to caseworkers who will be supporting trafficked people to make their next steps.
- > Our anti-trafficking pocket-guide, which is targeted at all of our people. This provides a reminder of the key signs and indicators of trafficking, and the internal colleagues they should get in touch with if they want to raise a concern.
- > We have also produced specific guidance in relation to Section 52 of the Act, which covers the duty to notify the Home Office of potential victims of modern slavery.

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



## Relationships with our suppliers

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

Further to the Procurement Policy update referenced above, we have updated a range of our corporate procurement processes (including the specification, terms and conditions and tender response and evaluation documents).

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

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

in accordance with the Act, we expect our partners to fully meet their responsibilities.

The British Red Cross is a member of Supplier Ethical Data Exchange (Sedex), a not for profit membership organisation focused on ethical and responsible business practice in global supply chains. Our membership of Sedex requires that we risk assess our supply chain annually to ensure that we can reasonably ensure that our supply chain is free from modern slavery.

Any member of the public can make a complaint or raise a concern at any time using our Comments, Complaints and Compliments system. Information on how to do this can be found on our website: [redcross.org.uk/About-us/Contact-and-help/Comments-or-complaints](https://www.redcross.org.uk/About-us/Contact-and-help/Comments-or-complaints).

## Our commitment to people in crisis

As part of our commitment to people in crisis, this final section covers how we highlight the support needs for at risk populations and the independent, neutral and impartial assistance we provide in the anti-trafficking work that we deliver to people in crisis.

We have an anti-trafficking vision that no person will be trafficked and/or exploited. Our mission in the anti-trafficking work that we do is that any person who is trafficked and exploited will be recognized, supported and protected.

In recognition of our commitment to supporting people in crisis through our anti-trafficking work, one of our key 2017 delivery pledges in our Corporate Business Plan is to see reduced destitution and distress for displaced people. As part of our commitment to delivering this outcome, we will invest in developing bespoke and enhanced support for people who have been trafficked or subjected to modern slavery, building on the work already achieved through the PROTECT project.

Our volunteers and staff work alongside civil society, police and local authorities to help victims of human trafficking. In the work that we do around anti-trafficking, we have a number of guiding principles which we focus on:

- > The provision of care and support to trafficked people;
- > Filling gaps in the provision of statutory support, and advocate for continuous improvements to ensure that trafficked people receive the support they need; and
- > Working in partnership and through partners aiming to strengthen the sector and supporting other organisations to carry on their important work.

## Core services

### Casework support

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, access to English classes and other support groups. We are working to expand this service all around the UK with specialist anti-trafficking caseworkers, so that more trafficked people can benefit from non-directive information and support to make choices about their next steps.

### Connecting with family

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

### Reception Centres

Survivors of trafficking and exploitation are hugely vulnerable. They may require help from a range of our services, and we are committed to helping them receive the assistance they need.

Our emergency response teams often set up reception centres for exploited and potentially trafficked people, once local police or the National Crime Agency (NCA) identify them. These are open 24 hours a day for a short-term period. Inside, we:

- > Provide emergency provisions, such as food, clothes and blankets;
- > Offer a listening ear and emotional support; and
- > Administer first aid.

## Targeted initiatives

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

This is enshrined in the revised Reception Directive of June 2013 that came into force on 21 July 2015. While the UK is not bound to this, special conditions are commonly recognised as best practice in line with EU human rights standards.

### TRACKS project: improving support

We have partnered with Forum Refugies (France) on the TRACKS (identification of TRafficked Asylum seekers' Special needs) project, which is co-funded by the European Commission. In the UK, we are working closely with the Human Trafficking Foundation, UK-IMR, UNHCR, POPPY and AIRE Centre.

The TRACKS project aims to improve the support to trafficked asylum seekers in the asylum process (procedural and reception conditions) by:

- > researching and mapping to identify national legislation, regulations, case-law, good practice and gaps in relation to the assessment of specific needs of trafficked people in the asylum process;
- > networking, collaborating and raising awareness of national stakeholders through focus groups and opportunities to discuss the complex situation;
- > interviewing trafficked people to identify any special needs of those who have been through an asylum procedure; and
- > supporting and building the capacity of national practitioners with practical tools and capacity-building workshops.

### Your Space: Pre-NRM Support

In addition to this, we operate a pre-National Referral Mechanism (NRM) support programme called Your Space, whereby potentially trafficked people (identified by the police and other frontline professionals) can be provided with accommodation, material support and a caseworker. The aim is to provide them with information and support so that they understand the choices and options available to them, and receive the necessary support to act.

Some examples of the choices people can make include: entering the NRM, returning home, or alternatively finding employment elsewhere. This project was developed because first responders often found that they did not have an appropriate space to accommodate the potentially trafficked person, nor to provide them with enough time and the information they needed to decide what they would do next.

### Migratory Trails and Post-NRM Support

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

This project will work on three key objectives:

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

## Support to the Movement

In addition to our work in the UK, we want to enable the wider network of National Red Cross and Red Crescent Societies to respond to trafficking within their own contexts. As a result we co-Chair the European Red Cross Action for Trafficked Persons Network (ATN), which is focused on providing practical support to our fellow European National Societies.

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

## Next steps

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

- > Continue to roll out training to frontline staff through the two training modules we have developed through the PROTECT project.
- > Keep our guidance documents under review to ensure they remain fit for purpose, and that our people understand the internal referral pathway to report any concerns.
- > Embed and expand targeted support initiatives, such as Your Space and the STEP project.
- > Develop a Supplier Code of Conduct.
- > Evaluate progress at the end of 2017 against the delivery pledge stated in the Corporate Business Plan in relation to support for victims of trafficking and modern slavery.

Any member of the public can make a complaint or raise a concern at any time using our Comments, Complaints and Compliments system. Information on how to do this can be found on our website: [redcross.org.uk/About-us/Contact-and-help/Comments-or-complaints](https://redcross.org.uk/About-us/Contact-and-help/Comments-or-complaints).

**Where we are:**

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