

The Modern Slavery Act

The 2019 statement from the British Red Cross

There is currently a year on year increase in the number of reported cases of trafficking both globally and within the UK, indicating an improved understanding of trafficking and the variety of forms it takes. Trafficking, exploitation and modern slavery can be uncovered across vast supply chains¹ as we become more aware of the changing industries and the varying forms that exploitation can take.

At the British Red Cross, our vision is of a world where everyone gets the help they need in a crisis. Our mission is to mobilise the power of humanity so that individuals and communities can prepare for, deal with, and recover from crises. Just over 17,000 volunteers and over 4,000 staff work together 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 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 the Red Cross, the International Committee of the Red Cross 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, its seven Fundamental Principles which guide all that we do.

The British Red Cross, like other National Red Cross and Red Crescent Societies, 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 war². This means that the British Red Cross has a unique legal status: it is a private organisation with certain recognised public functions; it is neither part of government nor a non-governmental organisation. The auxiliary status and role are a National Society's standing invitation to participate in public humanitarian services; they provide an automatic relationship between a National Society and its government. Whilst an auxiliary to Her Majesty's Government, the British Red Cross is also required

to maintain its autonomy so that it can act in accordance with the Fundamental Principles³.

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

At the British Red Cross, we are committed to the prevention of modern slavery or human trafficking in our supply chains and our ambition for our continuous improvement plan is to eradicate modern slavery completely in any part of 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 2019 delivery pledges in our Corporate Business Plan was to see reduced destitution and distress for displaced people. As part of our commitment to delivering this outcome, we developed bespoke and enhanced support for people who have been trafficked or subjected to modern slavery. Each year, we support tens of thousands of people through our refugee services across all of the UK and over 300 people who have experienced trafficking. This includes adults and children. We continue to be committed to this pledge and will grow this work in 2020 to further spread across our UK and overseas operations. The objective for our anti-trafficking work is that any adult or child who is trafficked and exploited will

be recognised, supported and protected, and that adults are supported to make their own informed safeguarding decisions.

This document fulfils the British Red Cross' reporting obligation, in line with the Modern Slavery Act 2015 ("the Act"), to provide a slavery and human trafficking statement covering activities for the financial year ending 31 December 2019. Since the last statement, our Modern Slavery in Supply Chains working group has been leading the developments across the organisation and will continue to do so.

We have set out the work we carried out in 2019 as part of our continuous improvement plan to ensure we are working to reduce any risk of modern slavery in our supply chains. This statement builds on our statements from previous years, highlighting new developments and important initiatives we have taken proactively to reduce the likelihood of exploitation, trafficking and modern slavery from

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

This statement was approved by the Board of Trustees at its meeting on 7 April 2020.

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



Mike Adamson, chief executive officer



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



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¹ Trends documented in the UNODC Global Report on Trafficking in Persons 2018 www.unodc.org/documents/data-and-analysis/glotip/2018/GLOTIP_2018_BOOK_web_small.pdf

² Article 3, The Royal Charter of the British Red Cross Society.

³ Statutes of the International Red Cross and Red Crescent Movement, Preamble, Principle of Independence.

Our progress in 2019

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

Governance

- We continued to roll out the British Red Cross Code of Conduct, which applies to all staff and volunteers. This confirms we will not tolerate exploitation (including sexual exploitation), abuse or violence.
- An e-learning module on the Code of Conduct has also been launched in 2019 and is mandatory training for all staff and volunteers. Governance keeps track of completion rates in order to devise strategies to raise compliance. In 2019, 764 of over 4000 staff had completed the training, which accounts for roughly 19% of all staff. In terms of the organisation's senior leadership, the Board had a completion rate of 92% (11/12), the Executive Leadership team of 100% (8/8) and the Governance Team 100% (6/6).

Suppliers and partners

- We require all new suppliers to sign up to our supplier Code of Conduct and communicated this to all existing key suppliers supporting our UK operations. All our suppliers have either signed the Code of Conduct or alternatively had their policies reviewed to ensure they meet our standards (except existing property landlords, discussed below).
- Our ethical fundraising procedure was utilised throughout 2019 to screen all significant donations, partnerships, sponsorships and gifts in-kind. It involved declining one donation based on alleged modern slavery offences in 2019.
- We continued our due diligence of international partner organisations to assess their capacity, systems, policies, processes and culture in relation to prevention and response to sexual exploitation, abuse and sexual harassment (PSEAH) and to help support development of their improvement plans. This work will carry over into 2020 and beyond.

Safeguarding

- Significant improvements were made to our capacity for safeguarding, and these are outlined in the safeguarding section below. We carried out a 'Keeping people safe' review and have a series of recommendations to roll out in 2020.
- An e-learning module on safeguarding has been launched and is mandatory training for all staff and volunteers. We keep track of completion rates in order to devise strategies to raise compliance. In terms of the organisation's leadership, to date the completion rate for the Board is 92% (11/12), the Executive Leadership team 100% (8/8) and the Governance Team 100% (6/6).

Training

- We continued to roll out modern slavery-specific training across the organisation, with over 170 people trained in basic awareness, 70 people completed online training in anti-trafficking casework skills and 14 trained face-to-face in casework skills. We utilised the British Red Cross learning platform, Fuse, to enhance the accessibility of this training and also to have more active discussion on trafficking across the organisation.

Anti-trafficking programmes

- We conducted an evaluation of three key aspects of our work in 2019 – our involvement in reception centres, our work on Your Space (early intervention support programme), and on the STEP longer term support project. The reception centres research is being disseminated through our stakeholder networks, the Your Space research is currently being finalised with a paper due to be released in 2020, and the STEP report 'Hope for the Future' is published and [available on our website](#).

- We have worked throughout 2019 to strengthen and support our partnerships, both in the UK and internationally. We are proud of our strong partnerships and work to improve collaboration in the sector by seeking joint working opportunities, funding and ways to showcase the work of other organisations.
- We have worked to strengthen our operational offer both in the UK and internationally, improving our ability to support more adults and children who have been trafficked. We have continued to work with the International Red Cross and Red Crescent Movement to strengthen the Movement's ability to respond to trafficking.

An internal working group consisting of the heads of the relevant departments engages regularly to monitor our progress in relation to our commitment to tackle modern slavery and the actions we have set out.

Using our voice:

- We further developed our advocacy and policy work relating to trafficking in the UK and internationally. We worked closely with our operational colleagues to inform our areas of strategic focus as well as our public messaging. We conducted research to further develop our evidence base, including relating to pre-National Referral Mechanism (NRM) support, as relevant to the national roll-out of support.
- In line with our role as an auxiliary to the public authorities in the humanitarian field, we worked with cross-department representatives from the UK government aiming to support the effective implementation of the Global Compacts, including components focussed on trafficking.

Our governance structure

The British Red Cross has its head office in London. In 2019, our total annual income was £244.9 million.

The British Red Cross operates in nine British Overseas Territories, and in accordance with our Royal Charter, these entities are known as overseas branches. Included in the British Red Cross group accounts are the accounts of the three overseas entities, which are locally incorporated: the Bermuda Red Cross, the Cayman Islands Red Cross and the Turks and Caicos Islands Red Cross; and one related trust, the Bermuda Red Cross Charitable Trust. These are accounted for as subsidiaries, in accordance with the SORP⁴. The Anguilla Red Cross, the British Virgin Islands Red Cross, the Falklands Islands Red Cross, the Gibraltar Red Cross, the Montserrat Red Cross and the St Helena Red Cross are accounted for as branches, in line with the SORP. Our group accounts include the accounts of Britcross Limited, a wholly-owned trading subsidiary which donates its trading profits from 340 retail shops to the British Red Cross. This statement covers all of our activities, including Britcross Limited.

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

The board can comprise up to seven elected members (chosen from our active volunteer base) and up to six co-opted members appointed by the board. The board's role and functions are laid out in our Royal Charter and supplemented by Standing Orders which set out our rules of governance.

The board is supported by committees working with delegated decision-making authority in specific areas and includes 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 a company has its own modern slavery act statement, and flag

any accusations, press coverage and lawsuits connected to modern slavery, regardless of having a modern slavery statement. This information will form part of the decision making on accepting the gift, donation or partnership. In 2019, we declined one donation on the basis of modern slavery allegations regarding the potential donor.

The executive leadership team (ELT) is responsible for the day-to-day management of the organisation and is led by the chief executive. The chief executive works closely with the board to agree a clear direction for the organisation and supports ELT to give effect to that direction and be accountable for its delivery.

Together the board and ELT approve and oversee the implementation of our group corporate strategy. The board and ELT also manage the governance of the organisation through policies and procedures, which set out a clear framework for our activities and services.

Policies and procedures are instrumental to achieving our strategy to support people in crisis, as well as ensuring that the work we do meets clear internal and external standards. We are committed to the prevention of modern slavery and human trafficking in our supply chains or in any part of our operations. We have a comprehensive corporate policy framework in place to ensure our people understand what is required of them, to capture the specific risk of modern slavery and trafficking in our work and promote awareness amongst our people of their responsibilities.

Our corporate policy framework is well established and our initial work when the Act was first introduced focused on updating key policies and processes, including our employee handbook for staff; ensuring our 'raising a concern' (whistleblowing) policy made reference to the Act; and our commitment to maintaining the highest standards of conduct and ethical behaviour, which is conveyed to candidates during our recruitment process and throughout the induction stages.

⁴ SORP = Statement of Recommended Practice: Accounting and Reporting by Charities preparing their accounts in accordance with the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102)

Our supply chains and due diligence process

We are committed to recognising and responding to trafficking if we do encounter it as part of our work – including in our supply chains, as well as in any part of our operations. It remains a priority for us to explore our responsibilities beyond tier 1⁵ due diligence, and work is ongoing in this regard.

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

In previous years, our corporate procurement processes have been updated to take account of the Act, and the risk of modern slavery incorporated in the due diligence process for key suppliers. Our international and UK programmes are becoming more aligned as we seek to take a unified approach to due diligence of all suppliers managed by UK and international procurement, and progress towards alignment will continue throughout 2020 and into 2021.

Currently our due diligence, including regarding compliance to the Code of Conduct, largely relies on supplier self-certification. However, making our due diligence process more robust and proactive on our part has been a priority for us. This is something we remain committed to improving and in 2019 we began to implement processes for checking suppliers against third-party databases. One example of this is the implementation of supplier counter-terrorism (CT) checks on suppliers for our international programmes, wherein potential suppliers are checked against a set of external

databases and flags raised if a match is found⁶. This has been implemented across a number of British Red Cross-supported international programmes and will continue to be a basic prerequisite for procurement above a given threshold. The CT clause was part of 50% of all grant agreements signed from July 2019 onwards. We are developing monitoring and reporting procedures with which to evaluate the effectiveness and compliance with the CT procedure. In 2019, we aligned our procedure on how we will carry this out for the supplier base relating to our UK operations. CT checks have been introduced for key suppliers for UK operations at supplier creation and tendering stage in 2020. We are exploring how such proactive processes of checking against external databases could be used to support modern slavery due diligence of our supply chain.

The British Red Cross supply base covering UK operations consists of a pool of 2,833 suppliers with spend considered as sourceable⁷. 96% of this spend is with UK-based suppliers, leaving 4% with non-UK based suppliers. 23% of the UK operations' supplier spend has links to overseas supply chains. In recognition of this, we have commenced looking at the wider supply chain as part of our selection criteria. Suppliers must evidence their own due diligence of their supply chains as part of our procedures whereby within our due diligence questionnaire, we ask suppliers questions about how they are managing their own supply chains, including reference to and frequency of quality checks and auditing.

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

⁵ Tier 1 refers to our first line of suppliers – the organisations we deal with directly as our suppliers. Tier 2 would refer to the suppliers they in turn deal with, and so on.

⁶ In 2019, 1014 searches were carried out with 464 searches resulting in no positive matches, 144 searches resulting in 1 to 10 positive matches and 406 searches returned more than 10 positive matches.

⁷ 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 which cannot be influenced or negotiated, and could include taxes, government payments, intercompany transfers, etc.

Supplier Code of Conduct

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

Throughout 2019, **all existing** key suppliers for UK programmes, that we continue to use with a cumulative procurement value of £50k or higher, received the supplier Code of Conduct to sign. As highlighted above, the international logistics team does not have a significant number of repeat suppliers, therefore every supplier submitting a bid against a tender is required to confirm compliance with our Code of Conduct as a component of the tendering procedure.

100% of our key existing suppliers (mostly applies to UK programmes), as well as 100% of our new key suppliers (both UK and international programmes) have either signed the Code of Conduct, or alternatively the Governance team has reviewed the supplier's policies, procedures, statements, codes of conduct and any other corporate instrument to confirm they have adequate commitments to prevent modern slavery in place. In addition, we have introduced a new procurement system that has improved transparency of our due diligence procedures.

When we have stopped working with suppliers in 2019, the supplier's willingness to sign the Code of Conduct was taken into consideration as a contributing factor when making this decision.

In the case of existing property landlords, we have determined to require they 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, a decision will be escalated to senior management to proceed or not.

SEDEX

We are a member of Supplier Ethical Data Exchange (Sedex), a not-for-profit membership organisation focussed on ethical and responsible business practice in global supply chains. Our membership of Sedex provides us with the opportunity to assess our supply base via this database, to scope the risk of modern slavery, and our response to that risk. Over the course of 2020, we will explore how we might use this service to develop our approach to modern slavery.

Supplier consolidation

The British Red Cross has a high number of external suppliers, which can limit our control capabilities. Therefore, we seek to reduce the overall number of suppliers, which improves our ability to manage those suppliers and their compliance to our required standards. In 2019 we delivered over 10% reduction of active suppliers, compared to 2018, and will be accelerating this process in 2020 with an aim for a further 20% reduction.

Training procurement and purchasing teams

Since 2019, the Red Cross online training module on 'Recognising the signs of trafficking' has been part of the onboarding process for all new starters in the corporate procurement and international logistics teams. As a result, both teams have obtained 100% completion of this module meaning all procurement personnel are trained in understanding what trafficking and modern slavery is, how to spot the signs and how to respond in line with our organisational safeguarding requirements.

This will become part of the induction requirements and will be rolled out to all existing purchasing and Shared Service Centre (SSC) staff in 2020.

Identified risks in our supply chains and mitigation measures

We remain aware of risks within our supply chains that we are seeking to address through the work of the Modern Slavery in Supply Chains working group:

- 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 been required. As a result, we cannot confirm the status of our properties that have not required a lease renewal in 2019, and so is being addressed in 2020.
- We currently rely on supplier self-certification as our mode of due diligence. We want to make this more robust and will explore ways to manage more proactive checks on suppliers beyond self-certification.
- We currently manage our supply chains at Tier 1 level – which means the suppliers with whom we directly engage. We have started to require suppliers with overseas supply chains to submit evidence of the work they are doing to manage those supply chains with regards to modern slavery. This is ongoing work and we will be doing more in connection to this risk area.
- We do not currently utilise all the capacity of SEDEX to check suppliers' supply chains proactively. This is a missed opportunity and something we will aim to develop when more resource can be secured to do this.
- More focus needs to be given to our partnerships and organisations we provide grants to, particularly overseas, beyond the PSEAH work detailed above. We are working with the IFRC to create a Movement-wide approach to due diligence that would provide us with the level of assurance we require.
- Our procurement and purchasing teams are all compliant with their training on modern slavery and trafficking, however we still require a larger number of people across the organisation to complete the training. Many people across the organisation have an involvement in purchasing for their own services and operations, or alternatively could encounter trafficking and modern slavery in the course of their work or volunteering duties, and therefore we require a higher completion rate to ensure we are able to identify and respond to trafficking appropriately and safely each time.

Any member of the public can make a complaint or raise a concern at any time. Information on how to do this can be found on our website: [redcross.org.uk/feedback](https://www.redcross.org.uk/feedback)

Effectiveness of such measures

Measure	Progress
<p>All new key suppliers receive and sign the supplier Code of Conduct as part of their onboarding process.</p> <p>If suppliers do not sign the supplier Code of Conduct, we individually review their relevant policies to ensure the standards are met.</p>	<p>100% of new key suppliers have signed the Code of Conduct or have had their policies assessed and checked to meet adequate requirements.</p>
<p>All existing and repeat key suppliers receive and sign the supplier Code of Conduct.</p> <p>If suppliers do not sign the supplier Code of Conduct, we individually review their relevant policies to ensure the standards are met.</p>	<p>When we have stopped working with suppliers in 2019, the supplier's willingness to sign the Code of Conduct was taken into consideration as a contributing factor when making this decision.</p> <p>100% of existing key suppliers (excluding existing landlords) have signed the Code of Conduct or have had their policies assessed and checked to meet adequate requirements.</p>
<p>Proactive checks on suppliers are carried out beyond self-certification</p>	<p>In 2019 we started conducting counter-terrorism checks as one effort to check on our supply base on a more proactive basis.</p> <p>1014 searches were carried out with 464 searches resulting in no positive matches, 144 searches resulting in 1 to 10 positive matches and 406 searches returned more than 10 positive matches.</p>
<p>Requirement to check beyond Tier 1 Suppliers</p>	<p>We began requiring suppliers to evidence the action they are taking to manage their own overseas suppliers and will continue to work on this in 2020.</p>
<p>Supplier consolidation</p>	<p>In 2019 we delivered over 10% reduction of active suppliers, compared to 2018, and will be accelerating this process in 2020 with an aim for a further 20% reduction.</p>
<p>Ethical screening conducted on all significant donations, partnerships, sponsorships and gifts in-kind</p>	<p>1 potential donor was refused in 2019 as a result of this process.</p>
<p>Staff and volunteers trained in understanding and detecting modern slavery and trafficking</p>	<ul style="list-style-type: none"> - 100% of procurement personnel have completed the training and is now part of the induction requirements of all new team members. - By March 2020, 100% of purchasing personnel will have completed the training, and is now part of the induction requirements of all new team members. - Total of 170 people in the British Red Cross trained in module 1.

Our Policies in relation to Human Trafficking and Modern Slavery

Name	Details	Last updated or reviewed
British Red Cross Code of Conduct	Our Code of Conduct applies to all staff and volunteers and seeks to ensure that we uphold the highest ethical, professional and behavioural standards to support people in crisis. It confirms we will not tolerate exploitation (including sexual exploitation), abuse or violence. The Code of Conduct is available on our external website here .	Last reviewed in April 2019
Employee handbook	The Employee Handbook sets out the ethical conduct and behaviour expected of all staff operating both in the UK and abroad and 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.	Last updated in June 2019.
Procurement and purchasing policy	This policy provides a robust due diligence process to ensure that our procurement and purchasing activities are performed in line with our commitment to ethical purchasing and the Modern Slavery Act (the Act).	Currently being reviewed as part of the 3-year cycle policy review.
Raising a concern (whistleblowing) policy and procedure	<p>This policy and procedure, which refers to the Act and applies to all employees and volunteers, sets out the commitments and the process for reporting suspected concerns at work within a supportive environment such as suspected wrongdoing, risk or malpractice within the organization, including concerns involving our supply chains or any circumstances that may give rise to enhanced risk of slavery or human trafficking. It provides the option to raise concerns in a confidential or anonymous way.</p> <p>To support the procedure, we have in place a Raising a Concern FAQs, flowchart and guidance for managers.</p>	Last reviewed in May 2019 and currently going through an update to include the role of Freedom to Speak Up Guardian in the process.
Recruitment and selection (including agency workers) procedure	This procedure refers to the Act and sets out our commitment to maintaining the highest standards of employee conduct and ethical behaviour in our operations as well as when managing our supply chains, including to prevent slavery and human trafficking in any of our corporate activities. It states that we use only specified, reputable employment agencies to recruit staff and always verifies the practices of any new agency we use before accepting workers from that agency, ensuring they meet the requirements of our Preferred Suppliers List.	Last updated in June 2019.

Name	Details	Last updated or reviewed
Safeguarding policy and Safeguarding Children and Adult Procedures including the International Safeguarding and Protection from Sexual Exploitation and Abuse (PSEA) procedure	<p>We have in place a combined Safeguarding Policy and Procedures which set out how we fulfil our obligations to safeguard children and adults who are being abused or harmed or are at risk of abuse or harm. The policy and procedures relate to the people we engage with and support. They provide details about how to handle a concern about a child, young person or adult who is at risk, including the risks of modern slavery and trafficking, which are 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 the Safeguarding Assurance Team.</p> <p>The International Safeguarding and Protection from Sexual Exploitation and Abuse procedure applies to all our people working or visiting an overseas programmes and sets out how to respond appropriately to safeguarding concerns relating to children, young people and adults. It also provides clarity on the actions our people must take if they are concerned about the welfare of a child, young person or adult who is at risk. This policy is available on our external website here.</p>	Last reviewed in December 2018.
Transparency and accountability policy	<p>Consistent with the obligations of the Act, the Transparency and Accountability Policy 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. As a general principle we endeavour to release information in the interests of transparency unless there is a good reason not to do so (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). This policy is available on our external website here.</p>	Last reviewed in July 2019.
Incident reporting policy and procedure	<p>The Incident Reporting Policy and Procedures set out our commitment to encouraging and supporting good practice in identifying, managing and learning from incidents. The respective procedure set out the practical steps for reporting incidents, safeguarding concerns, accidents and near misses through an electronic reporting system (Datix), which enables appropriate management of incidents. It also provides for incident investigation, lessons learned and implementation of mitigation actions.</p>	The policy and procedure will go through a comprehensive review in July 2020, having been lastly updated in November 2019.
Ethical policy	<p>This policy, which refers to the Act, sets the ethical standards for our organization, ensuring that we take a consistent approach across all of our operation as we deliver on our humanitarian mission to support people in crisis. It provides that when initiating new significant activities or partnership, decisions will be informed by applying best practice due diligence assessments, which ensures relevant activities meet our charitable objectives as well as our ethical standards. This policy is available on our external website here.</p>	This policy is currently under review as part of the three-year review cycle.

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 an organisation with both a UK and an international purpose, we have two senior safeguarding leads; a lead for our work overseas and a lead for our work in the UK. We also have a trustee on our board with responsibility for safeguarding.

Over the past twelve months we have significantly strengthened our safeguarding provision:

- We have bolstered and embedded the Safeguarding Assurance Team which was established at the end of 2018. The team is made up of safeguarding specialists who are on hand to help our people respond to concerns regarding children and adults across all services and functions.
- We have set up a single point of contact safeguarding phone line (including out of hours) as well as a dedicated inbox to ensure the whole organisation is able to quickly access advice and support. The team quality assures all safeguarding cases reported through the British Red Cross' incident reporting system to ensure incidents have been correctly responded to and actions have been clearly evidenced and documented.
- We have comprehensive policies and procedures to keep the people we support safe. These include (but are not limited to) our professional boundaries procedure, our Code of Conduct, which sets out our expectations for the behaviour of our people, and our safeguarding policy which can be found on our website at redcross.org.uk.
- We have developed new online mandatory training for all our people to cover the basics of safeguarding children and adults and are working with directorates to ensure everyone has completed the course and included it on the induction list for new starters. Our safeguarding development managers produce tools and guidance for teams to promote informal learning; including model responses to specific scenarios, toolkits, guidance documents and 'light bite' training materials.
- We have also commissioned external consultants to conduct a 'Keeping people safe' review of our policy and practice with regards to safeguarding,

misconduct, and safe culture. This included multiple interviews with key stakeholders and senior leaders as well as workshops across the country with a broad range of staff and volunteers. The recommendations from this consultancy piece, alongside recommendations from an internal evaluation of practice following the 2018 broader humanitarian sector safeguarding failures, are currently being reviewed and implemented to ensure the British Red Cross remains a safe place for all; including staff, volunteers, and the people we support.

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

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

We report on safeguarding in our annual report: more information and statistics can be found [there](#).

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

Prevention of sexual exploitation and sexual harassment (PSEAH)

British Red Cross and the UK government's Department for International Development (DfID) led the development of an international pledge on prevention and response to sexual exploitation and abuse and sexual harassment (PSEAH). The pledge, which was presented at the International

Conference in December 2019, represents a big step forward in outlining common terminology, definitions, standards and actions for preventing and responding to sexual exploitation and abuse and sexual harassment within the Red Cross and Red Crescent Movement. It includes an action plan, developed through a process of consultation with States and Movement actors, which is intended to be practical and realistic for National Societies to implement within the next four years.

Training and guidance for our people

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

We have two specific training modules:

- **Module 1** was made available in 2015 on the IFRC learning platform for the IFRC and all 192 National Societies. Module 1 provides a basic introduction and response to trafficking and is designed for all British Red Cross staff and volunteers. In 2019, more than 170 learners completed this e-module. This included a face-to-face version of e-module 1, delivered as an Anti-Slavery Week activity to target a broader learner audience.

We also delivered a bespoke training session for Red Cross psychosocial support volunteers who provide emotional support to British citizens affected by disasters overseas, to enable volunteers to spot the signs of trafficking and know how to report concerns.

In 2019, an updated version of e-module 1 was made available, which was edited to be relevant to staff working internationally. We also delivered a bespoke face-to-face training to staff working internationally based on e-module 1.

- **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, helps us to provide non-directive information enabling people to make their own informed choice. In 2019, more than 70 learners completed e-module 2 and we trained 14 people face to face.

All our international staff, including consultants and representatives, are required to complete training which supports:

- awareness of expected standards of behaviour, including mandatory reporting of concerns,
- understanding of different types of abuse and harm, including modern slavery, and
- 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 and abuse (PSEA)
- Child protection at the IFRC
- Principles and rules for Red Cross and Red Crescent humanitarian assistance

Moving forward, we will utilise both the British Red Cross learning platform and the British Red Cross intranet to continue to promote these training modules to increase awareness amongst our staff and volunteers of the signs of trafficking, the internal referral pathways, and safeguarding procedures.

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

- The caseworker field guide, which is specifically tailored to caseworkers who will be supporting trafficked people to make their next steps.
- Our anti-trafficking pocket guide, which is available to all of our people. This provides a reminder of the key signs and indicators of trafficking, and the internal colleagues they should get in touch with if they want to raise a concern.
- 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.
- A toolbox for frontline workers who work with trafficked asylum seekers in order to understand their specific needs and tailor support accordingly. This toolbox was funded through the TRACKS EU-funded project and is available for the wider asylum sector in the UK, and is not limited to use only by the Red Cross.

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

Spotlight on our people policies

Voluntary internships, paid work experience and apprenticeships

The British Red Cross is working to reduce the possibility for exploitation and modern slavery across all our operations and programmes. Interning, volunteering and work experience programmes are an area we are proud to have worked on, to reduce the likelihood of these being exploitative and making these a positive experience for the people benefitting from the programmes.

The organisation recruits approximately 100 interns each year. 'Internships' have no legal definition or status. Interns are volunteers or staff if paid, and are one of the few volunteering roles commonly used in the private sector; particularly in the media, law and fashion. Internships are popular with younger people looking to gain work experience and are also used by people looking to change careers or returning to work after career breaks.

The British Red Cross has control measures in place to ensure that people 'interning' with the organisation have a positive experience. They are:

1. Each internship is **advertised on the British Red Cross website and on the Charity Jobs website**. Candidates must apply, are short-listed and interviewed.
2. All internships are **time limited**. There is a 12-week maximum limit.
3. They are **part-time**, so that people also have time for paid work, education or other commitments. The average at the British Red Cross is 3 days per week. Hours and days are negotiable.
4. Each intern **receives expenses to cover all travel costs related to their role and lunch** (and other subsistence if required).
5. More than half are outside of London (60% in 2019).
6. Each intern must be given clear **work objectives and regular catch-ups** with a named line manager. This is to ensure they get experience that they can demonstrate to an employer.

7. Each intern attends a **welcome workshop**, can attend a **career development workshop** and can access **one-to-one support** to get help completing job applications (for jobs inside and outside the Red Cross). They also have access to **British Red Cross training and development opportunities**, and can see internally advertised vacancies.
8. There is a **placements coordinator responsible for their welfare and support**.
9. Each internship is **evaluated**.
10. Net promoter analysis suggests that 89% of interns are very likely to recommend British Red Cross internships.

The British Red Cross follows the NCVO good practice guidance for voluntary internships. The Red Cross helped to write this guidance. The guidance helps charities ensure any legal obligations are fully understood and ensures that both parties are clear on expectations about the role. You can read NCVO's Volunteer Internships in the Voluntary Sector: Review and Guidance [here](#).

We undertook research to look at who gets access to British Red Cross internships based on household income⁸. As a result, we are piloting two schemes; funded internships and paid work experience:

Funded internships

- Our aim is to pilot this scheme with approximately 10 to 30 people. The role is still essentially voluntary, and the person has the status of voluntary worker.
- In addition to the control measures above, we are working with partner organisations to help people from low income households to access British Red Cross internships.
- Vacancies are promoted to partner organisations. They work with their young people to determine household income and for those meeting the criteria they help and encourage them to apply.
- If appointed the young person is placed with us by the partner, they can access additional expenses to help with their daily living costs. These can include food, toiletries or utilities, but excludes accommodation, leisure and entertainment.

⁸ In London this means household income under £25,000 where the young person is a dependent and £18,500 where they are independent. Outside of London this means household income under £22,250 where the young person is dependent and £16,500 where they are independent.

Paid work experience

- Our aim is to pilot this scheme with 10 to 15 people.
- People accessing this programme are recruited in a very similar way to funded internships but **are staff and receive governmental national living wage** (currently £8.21ph).
- **Can work full or part-time** and roles are time-limited to three months for full-time workers and up to a maximum of six months for part-time workers.
- People on this programme are asked to **set three learning and experience goals** to help them get the most out of the experience and have a named line manager.
- **Can access the career development support available to interns, British Red Cross training and see internal vacancies.**

Apprentices

- Are **members of staff**, with the same rights and obligations as any other member of staff.
- British Red Cross currently recruits very few apprentices. It has over 35 currently and most are current staff benefitting from an apprenticeship as a learning and development option.
- A newly recruited apprentice **will receive the government national living wage** (currently £8.21ph) **or 75% of the normal starting salary** – whichever is higher. They can expect to move up to the full starting salary as they complete their training.
- Are **supported by an external training provider.**

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 2019 delivery pledges in our corporate business plan was to see reduced destitution and distress for displaced people.

Since 2009 the British Red Cross has supported survivors of trafficking and modern slavery. Our focus is on ensuring that survivors of trafficking are provided with the support they need to recover from the trauma they have experienced, and that they are enabled to make informed choices about their futures. Anti-trafficking remains a core priority of the 2030 British Red Cross strategy for our work in the UK and overseas, and a major area of our operational delivery.

Since 2014 the British Red Cross has increased its capacity to recognise and help people who have been trafficked by ensuring all frontline staff and volunteers receive training to enable them to confidently respond to any signs of trafficking that they may come across as part of their role. In recent years, the British Red Cross has been at the forefront of strengthening the Movement-wide response to trafficking, working with Red Cross and Red Crescent Movement staff and volunteers across the world to build capacity and develop projects that put the unique vulnerabilities of trafficked people at their core.

We believe that by providing the right information at the right time, survivors of trafficking can be empowered to make informed choices about their futures. Therefore, our programmes in the UK and abroad focus on ensuring survivors have access to the support and protection they need to recover, including psychological support and access to justice.

More recently, the British Red Cross has placed a great emphasis on the importance of co-production. We have developed a collaborative approach that includes the development of services in partnership with people with lived experience of trafficking and modern slavery.

In the UK, our volunteers and staff work alongside civil society, 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 which we focus on:

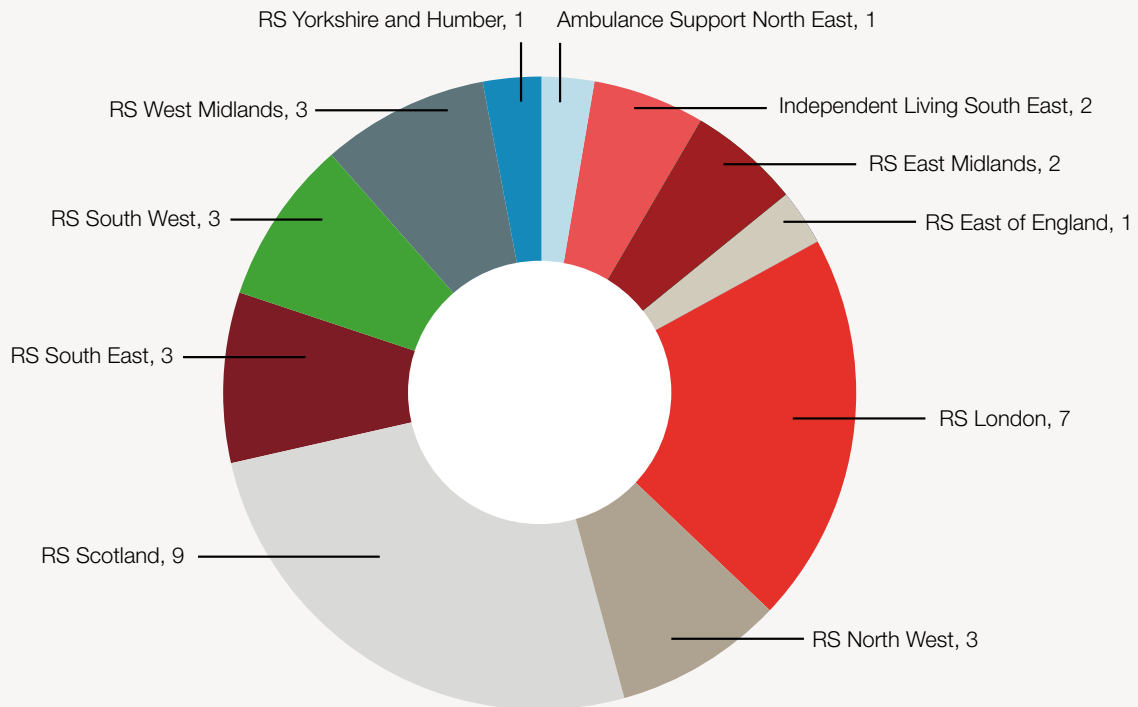
- The provision of care and support to trafficked people, and encouraging the sector to focus on the protection of trafficked people and putting their needs at the centre of any response.
- Filling gaps in the provision of statutory support, and advocate for continuous improvements to ensure that trafficked people receive the support they need.
- Working in partnership and through partners to strengthen the sector's response to trafficking and supporting other organisations to carry on their important work.
- Empowering trafficked people to make their own informed choices, and supporting them in the choices they make.

Safeguarding across our services

The British Red Cross requires that all safeguarding incidents are reported and investigated to ensure good practice and generate learning outcomes to reduce reoccurrence and monitor performance. These are reported through Datix directly by staff and volunteers, which can be accessed via an icon on their desktop. Below is a report showing the Datix reports for modern slavery in 2019.

The majority were reported in refugee support and restoring family links (RSRFL) and there were also some reports from ambulance support and independent living. The 35 cases reported represented 2.3% of the total safeguarding reports for the year, which was a 218% increase from modern slavery reports in 2018. There were also 25 additional cases where the term 'trafficking' was referenced in the incident description which are not captured below as they were reported under a different category, which may have been the main safeguarding issue at that moment.

British Red Cross modern slavery cases 2019



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

- Not all modern slavery cases will be categorised on the incident reporting system under this description. For example, some may be categorised by reporters as sexual abuse, physical abuse or psychological abuse and so would not appear in the above chart.
- There is no statutory category of modern slavery for children's safeguarding so any children affected would have been recorded under one of the four child abuse categories (physical, sexual, emotional, neglect).
- There is a recognised challenge of underreporting of all safeguarding concerns across the organisation which we are working to address. Many of the cases will have simply been logged in service's database (Beneficiary Relationship Management System) reports and not added to Datix.
- The anti-trafficking team do not record all their cases on Datix as this would not be a viable case management system and so only cases where there are additional safeguarding or exceptional/complex modern slavery concerns will have been recorded.

⁹ All safeguarding concerns across our work at the British Red Cross are recorded on Datix (internal electronic incident reporting tool). Introduced in 2016, Datix enables our people to report safeguarding concerns (and other incidents, accidents and near misses) quickly so that we can follow up concerns, contribute effectively to external safeguarding investigations, make any necessary changes and assist services with improving and developing their safeguarding approach and responses.

Core services

Our core services run across the organisation and are embedded within our UK and overseas operational programmes. They are both mainstreamed into existing work, and are also standalone specific programmes.

Specialist trafficking support in the UK

We provide specialist anti-trafficking casework and support services through a small team of anti-trafficking officers, in the North West, the East Midlands, Yorkshire and Humberside, London and the West Midlands, who deliver some core services and also operate restricted funded projects:

- Your Space – initial support (pre-NRM)

We operate a model of support for survivors of trafficking at the point of identification, working with local statutory and non-statutory stakeholders. This support programme is called Your Space, whereby potentially trafficked people (identified by police and other frontline professionals) can be provided with accommodation, material support and a caseworker. The aim is to provide information and support so that they understand the choices and options available to them, and receive necessary support to act. This project was developed because first responders often found that they did not have an appropriate space to accommodate the potentially trafficked person, nor to provide them with time and information they needed to decide what they would do next.

Based on our experience of delivering this service, together with ATLEU, Human Trafficking Foundation and Anti-Slavery International, we developed principles for early support which can be found [here](#).

This programme was evaluated towards the end of 2019, and the findings of evaluation will be utilised to develop and improve this service. We will also release an external policy paper in 2020.

- Longer term support

In 2019 we delivered and concluded an integration pilot in collaboration with Hestia and Ashiana. Using three innovative models of support, the partners provided medium to long-term care to survivors of trafficking exiting the NRM provision. Qualitative data was gathered consistently so we were able to measure the impact of this support model.

The report from this STEP pilot, called 'Hope for the Future', can be found [here](#).

We continue to offer this model of support across all our delivery points.

- Support to people who are outside of key systems

Our anti-trafficking team provides support to trafficked people who have either chosen not to enter the NRM, or who have received their reasonable or conclusive grounds decisions and are no longer within the NRM. The team are working hard to respond to survivors at any point where a survivor may encounter a crisis and need additional support. We offer casework support and destitution assistance.

- Second tier advice across the organisation

Our team also provides advice to other internal colleagues responding to trafficking around the UK, enabling them to appropriately and sensitively respond to trafficking.

We are working to expand this specialist support all around the UK, so that more survivors of trafficking can benefit from non-directive information to make choices about their next steps.

Refugee support provision

Our refugee support teams come across people who have been trafficked into or around the UK or are vulnerable to being trafficked. We support people with subsequent issues, as well as their need for protection and asylum. We offer psychosocial support, referrals and signposting, destitution assistance, and access to English classes and other support groups. Some of these services will vary around the UK depending on local need and gaps in provision.

As the largest independent provider of support to people seeking asylum and refugees in the UK, the British Red Cross has specific speciality in the trafficking and asylum nexus, and how both these systems and experiences can impact the person.

Connecting with family

People who are trafficked are often separated from their families, and sometimes unable to find them. If they choose to re-connect with their families, we can help them look for their loved ones. Our restoring family links service helps people look

for family members, restore contact and reunite families, and seeks to clarify the fate of those who remain missing.

Reception centres

Our emergency response teams are asked to set up reception centres for exploited and potentially trafficked people, when local police or the National Crime Agency (NCA) conduct anti-trafficking operations. These are open 24 hours a day for a short-term period. Inside, we provide emergency provisions, such as food, clothes and blankets; offer a listening ear and emotional support; and can also administer first aid.

In 2019 we conducted an evaluation of this model of intervention and are working with authorities to improve this offer based on the findings.

Support to the International Red Cross and Red Crescent Movement components

The British Red Cross is committed to using its learning and experience to support the wider International Red Cross and Red Crescent Movement by providing guidance, funding and technical expertise. In turn, this will strengthen National Societies' capability to prevent, identify and respond to trafficking, whether through specialised programmes or mainstreaming it into other ongoing activities, and promote policy change. We are keen to learn from our sister National Societies to improve our own response and channel this more broadly. The support to the Movement is now part of our core offer.

We have been working closely with Movement components in the Asia Pacific, European and Africa regions, both through the IFRC and with some National Societies directly, to share learning

and promote interventions aimed at reducing risks, recognising and responding to trafficking. Our interventions focus on supporting people who are at risk of or facing exploitation in migration and displacement contexts, in line with British Red Cross' 2030 corporate strategy.

We co-chair the European Red Cross Action for Trafficked Persons Network (ATN), which is focussed on providing practical support to our fellow European National Societies, prompt collaboration and share practice. This year we co-organised the annual meeting which saw ten National Societies and the IFRC coming together to share best practice, achievements and commitments for the year to come. We also co-delivered regional training on human trafficking for 12 European National Societies and have offered follow-up peer support to four of them.

We represent the IFRC on the Global Protection Cluster Anti-Trafficking Task Team.

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

Projects

We are part of a range of different projects, connected to strengthening and supporting British Red Cross' core work, focussed on building improved evidence of the needs and solutions in order to inform advocacy on the issue of trafficking. More information about Red Cross projects can be found on our website [here](#).

Using our voice

Advocating for improvements to the protection of survivors of trafficking

The goal of British Red Cross advocacy in terms of trafficking is for fewer people to be exploited, and for survivors to be protected from further exploitation, know where to seek help, have access to end-to-end support and have their humanitarian needs met. We want people to know how to spot the signs of exploitation and respond.

In 2019 we published our first advocacy reports on human trafficking and exploitation. Domestically, 'Hope for the Future: Support for survivors of trafficking after the National Referral Mechanism' highlighted the impact that the lack of support people receive when they leave the NRM has on survivors. This includes potentially putting people at risk of being re-trafficked and exploited again.

The report was based on an evaluation of the STEP programme and was published in partnership with Ashiana and Hestia. The report made a number of recommendations for improving the support people receive when they leave the NRM:

- **Support:** people who have been found to be survivors of trafficking should continue to receive tailored, person-centred support that helps them to rebuild their lives, for at least 12 months after they leave the NRM – irrespective of their immigration status.
- **Status:** survivors of trafficking should be protected and given security, through the grant of immigration status of at least 30 months.
- **Safe homes:** people who have been found to be survivors of trafficking should be able to access secure, appropriate long-term accommodation.
- **Pathways:** people leaving the NRM with a negative conclusive grounds decision should have a care pathway in place to help them access advice and support services.

The report was shared with government ministers and officials, as well as parliamentarians and non-statutory partners. The report was covered in several media outlets, and was released at a timely moment as the UK Home Office was considering its response to a legal challenge concerning the length of time support is provided to survivors following the NRM.

In 2019 we also commissioned and undertook research into the experiences of people entering reception centres following anti-trafficking police operations. The research will be published in 2020.

Next steps

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

Suppliers and partners

- Continue to link our UK and international procurement due diligence processes to ensure more consistency across British Red Cross procurement as a whole.
- Implement supplier due diligence procedures across international procurement, based on a set of agreed triggers (value, product and/or supplier location) and look to expand the application of those procedures down the supply chain.
- Build on the international partner due diligence process, such that weaknesses observed within their procurement processes trigger corrective action. This will require support from our regional teams.
- Continue to engage with property landlords to obtain 100% compliance on the supplier Code of Conduct.
- Further the programme of supplier consolidation reducing our overall number of suppliers.

Safeguarding

- Implement key recommendations from the external review of our approach to Keeping People Safe as part of a wider organisational redesign process
- Create and implement a new safeguarding learning and development strategy; ensuring learning is tailored to the role and context the staff or volunteer is operating in (including a focus on modern slavery);
- Continue to use Datix reports to inform safeguarding development priorities (such as specific scenarios with 'model' answers or themed learning modules);
- Develop approaches to support people who have been abused.

Training

- Seek further completion of the online e-module (Module 1) across the organisation.
- Continue to monitor completion of the code of conduct, safeguarding, data matters, and equality, diversity and inclusion trainings by all staff and volunteers to keep devising strategies to raise awareness and compliance with these policies.

Anti-trafficking programmes

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

Using our voice:

- Throughout 2020 we will continue to engage with policy and decision makers to share evidence, good practice and recommendations. We will aim 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.