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# MODERN SLAVERY STATEMENT 2022

Report modern slavery concerns about our business or our supply chain.

You can leave feedback anonymously: [REPORT NOW](#)



## OUR BUSINESS AND SUPPLY CHAIN

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Safe & Free is an anti-trafficking organisation, registered with the Charities Commission in 2012 (charities number 1147308). We have substantial experience in the identification and rescue of victims of slavery including those trapped in sexual slavery. We provide free educational resources countering the grooming and sexual exploitation threat to young people.

Very large businesses have statutory obligations under the Modern Slavery Act. These responsibilities reach into their extended supply chains. Many of these companies use now their significant commercial leverage to pass these supply chain responsibilities directly to the “at risk” businesses in their supply chain. These smaller supply chain companies must demonstrate that they have identified their modern slavery risks and mitigated them adequately if they are to continue to enjoy good commercial relations with their larger clients.

Safe and Free provides resources for SME’s to identify and address their modern slavery threat. This includes support for the risk assessment process, online training materials providing guidance to shop floor, management and executive levels within the company, the preparation of the modern slavery statement and mitigation of risk within operations and the supply chain. We incorporate an anonymous reporting mechanism for any/all slavery concerns on our whistle blower reporting mechanism. Whilst the scheme is able to provide us with feedback about what people think of our policies and procedures, it is also capable of capturing reports of modern slavery concerns within our workforce or even elsewhere. We undertake with our modern slavery partners to ensure that all reports received on this mechanism are treated promptly and where necessary, are directed to the appropriate authority. If one of these reports requires further research and development we are grateful to Pinnacle Risk Consultancy one of our modern slavery partners, who will where necessary work with us to ensure the timely development of any such report/intelligence so that we can most effectively operate our reporting mechanism.

You can report any concern you may have about a possible victim or other person involved in slavery, including any modern slavery concern you may have about our business using this link [\*\*REPORT A MODERN SLAVERY CONCERN.\*\*](#)

You can even do so anonymously if you prefer.

For more than 10 years we have been fighting modern slavery. This has taken many forms and we have expertise in the identification, rescue, and support of victims including those trafficked into sex work. We create systems and resources designed to prevent Modern Slavery in a variety of settings. We supply teaching materials for use in schools and youth clubs, we have some customers with specialist audits into sections of their supply chain. We also support SME businesses with the tools they need to modern slavery proof their business.

We are working through our supplier lists to ensure that there are no slavery threats hiding in plain sight, we offer everyone in our supply chain access to our online training materials for a limited time so that all businesses in our supply chain will have had access to high quality anti-slavery training material. There is hopefully no excuse for an employee in our supply chain to be ignorant of the threat and unable to spot the signs of slavery

Our in-depth knowledge about the way that slavery operates across a range of situations is where we derive our confidence that we can provide solutions for modern slavery threats in the workplace.

- We work with business to identify risks of modern slavery and to mitigate these threats in pragmatic and effective ways.
- We provide free high-quality educational resources for teachers to help with the safeguarding of young people from Modern Slavery, CSE and Grooming.
- We supported individuals in the care system with a statistically higher level of risk of CSE, with inspirational mentors who helped them to recognise and realise their potential.
- We have gathered intelligence about slavery including sexual slavery and have undertaken interventions and rescues of victims of slavery.



# OUR MODERN SLAVERY POLICY



We provide pragmatic, effective, and innovative support to our service users to help them to 'modern slavery proof' their businesses:



We are committed to protecting and supporting our employees, our charitable work and our social enterprise business activities from the threat of modern slavery.



We will use our influence to encourage our suppliers to adopt a similarly ethical position.



We will ensure that all existing and future policies must respect the threat of modern slavery and all existing policy will be read in conjunction with this policy to ensure that it both recognises and mitigates modern slavery threats wherever they may occur.



We will strive to maintain the highest levels of modern slavery transparency, so that our clients might have justification for their confidence in our continued relationship.



We will maintain our anonymous modern slavery reporting link which is readily accessible from our modern slavery statement. We will use social media to notify our employees and our customers that we maintain such a link.



We will use our influence to encourage our suppliers to adopt a similarly ethical position.



When we identify a victim of Modern Slavery through any of our work, we will be 'survivor focused' and will do all that is possible to support the survivor to ensure that they are;

- safe and immediately secure;
- aware of and able to access the help and support that is available to them;
- able, subject to our victim focus, to support authorities in bringing the offenders to justice;
- able to give us information about other victims that our survivor might have come into contact with.



If we encounter modern slavery in our business, we will work with our modern slavery partners and the appropriate authorities to safeguard affected victims and to identify a remediation plan for the affected person(s).



# OUR BUSINESS AND SUPPLY CHAIN SLAVERY RISKS

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## **Internally:**

We do not utilise unskilled or temporary workers. We do not operate in a category of work which is especially vulnerable to parasitisation from traffickers. All our staff, including volunteers, hold high levels of awareness and understanding about the nature and threat of Modern Slavery. The training that we provide, the professional nature of the work we undertake around identification and prevention of human trafficking, the small size of our workforce, our modern slavery sensitive recruitment and selection processes and the close working relationships between our staff, mean we don't currently have structural vulnerabilities that expose us to ruthless parasitic human traffickers.

## **Externally:**

Our supply chain is small. We have identified those suppliers with which we spend more than £1000 per annum as being relationships over which we might exercise influence. Each of these businesses is required to respond to a Modern Slavery request for information, unless there is sufficient evidence of their compliance with the spirit of the Modern Slavery Act within a Modern Slavery statement accessible from their website.

Furthermore, those suppliers judged to be at elevated risk of exposure to Modern Slavery are asked to provide further information about the steps they have taken to increase their transparency or to mitigate those elevated risks.

We would consider a wide range of actions where any supplier fails to demonstrate responsible action in respect of their perceived threat. Initially we would offer to support them or encourage them to develop such a responsible position however if this were unsuccessful we would consider making formal complaint, withdrawal of business and may even consider publication of our concerns with a wider audience if they were serious enough.

**NOBODY IS FREE  
UNTIL EVERYBODY  
IS FREE**

# MODERN SLAVERY TRAINING

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There are four online training videos that can be accessed and viewed at any time. We train all new employees on the modern slavery threat and we screen our new employees to ensure that they have not themselves (currently or historically) been victims of modern slavery. We also seek to establish whether they have knowledge of others that may have been so victimised.

An employee must complete the training video and the knowledge check questionnaire to be considered fully trained.

	Employee	Manager	M.S. Lead	Executive
1 <sup>st</sup> line of defence	YES	YES	YES	Optional
2 <sup>nd</sup> line of defence	N/A	YES	YES	Optional
M.S. Lead	N/A	N/A	YES	YES
3 <sup>rd</sup> line of defence	N/A	N/A	YES	YES

**The first line of defence training** equips our workforce with some knowledge about modern slavery, the ways to spot it and how to report concerns. This is given to all employees of the company.

**The second line of defence training** helps managers understand how to implement the systems and processes which support and resource the first line of defence. What they need to do to ensure that the first line of defence training knowledge levels remain high and to keep the workforce vigilant to the threat of slavery. It identifies the managers responsibilities to pass on performance management information and preserve and collect evidence. It also provides support for escalating any report that they receive from an employee.

**The third line of defence training** sets the program in context for the executive management. It provides the rationale for fighting modern slavery both ethically and commercially. It explains their specific third line of defence responsibilities, which are about review and audit. The executive need to be able to conclude that the steps that have been taken are fit for purpose.

**The modern slavery lead training** enables the nominated person to support the second line of defence with the necessary systems and processes. These allow second line of defence managers to support concerned staff members whilst also collecting and forwarding relevant management information to the modern slavery lead. The modern slavery lead is also be expected to have an elevated knowledge of modern slavery challenges and to be in a position to provide advice and guidance into all levels of the organisation and will be the person usually expected to liaise externally on matters on modern slavery. The Modern Slavery Lead (CEO John Piekos) will also present the risk mitigation plan and ensure it is fit for purpose.



# MITIGATING THE THREAT

## Protecting our organisation:

- At SAFE, understanding and combating modern slavery is the business of all our staff. Ultimate responsibility for modern slavery, however, rests with our CEO, John Piekos.
- We introduced a modern slavery policy which should be read in conjunction with all other company policies so that Modern Slavery red flags can be identified anywhere that they might exist within the organisation.
- We trained our staff on how to spot the signs of modern slavery. This makes it more difficult for a forced labour victim to be inserted into our work force because our workers are alert to the threat and know how to respond if it occurs.
- We trained our managers to implement appropriate risk management processes and to investigate modern slavery concerns as soon as they are identified. In this way concerns are recognised immediately and proactively investigated.
- We trained our executive level so that they can review the anti slavery actions of the workforce and the management and confirm their fitness for purpose.
- We appointed a Modern Slavery Lead and trained and equipped that person to oversee and advise on modern slavery at all levels in the organisation.
- We embedded a Modern Slavery reporting mechanism, independently monitored by Safe and Free, into the Modern Slavery statement accessible on our website.
- We provide multi lingual resources in our workplace for workers with limited English language skills.
- We have built modern slavery into other aspects of internal audit. Our drugs and alcohol policy actively searches for slavery red flags. Our Finance and HR teams are aware of the significance of irregular financial and or living arrangements and will highlight any such potential red flags to our modern slavery lead.
- The modern slavery lead captures and retains all other relevant performance management data.
- The modern slavery lead will provide a report about modern slavery concerns and how they have been handled and resolved.
- To maximise transparency benefits we publicise our annual slavery statement and our anonymous reporting mechanism through our social media for the information of our workforce, our customers and even our competitors.

## **Protecting our supply chains from modern slavery:**

In relation to our supply chain we identify those businesses where our annual spend is sufficient to leverage the influence we might already have. We group our suppliers by country and by business sector.

- We undertake risk assessments informed by authoritative international and governmental sources. This helps us to identify potential child labour and forced labour threats within our supply chain.
- We require all new suppliers to provide assurances that they do not use slave or child labour.
- We provide all our suppliers with a time limited link to our online training resources which they can use without charge to provide essential training to their workforce.
- We set out our clear expectation that they should have:
  - Modern slavery training in place for their workforce.
  - Whistleblower / anonymous reporting mechanism for modern slavery.
- We invite them to sign up with our modern slavery partners to receive access to the full suite of modern slavery prevention tools, especially the embedded reporting mechanism.
- We have agreed with our Modern slavery prevention partners that every member of our supply chain may take a six month free trial of this anti-slavery prevention kit.

**When our risk assessment identifies a supplier with an elevated risk of modern slavery we use the one or more of the following mechanisms until we consider we have adequately mitigated the threat:**

- Desk top audit – checking the supplier’s online profile and seeking appropriate assurances from any modern slavery statement or other online documentation.
- Send the supplier a request for information including a requirement for the supplier to provide assurances and evidence of credible slavery prevention activities.
- Provide access to our modern slavery tool kit without charge for the first six months and set expectations that the supplier should train their workforce and provide access to an independent reporting mechanism for their workforce.
- Arrange for an independent site visit and audit report by our modern slavery prevention partners to provide necessary assurances about the modern slavery health of the supplier.
- Remove the business from our approved list of suppliers.



# MEASURING EFFECTIVENESS

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- Since our last modern slavery statement was published our whistleblower reporting mechanism has operated effectively and been tested regularly. No reports or concerns were made using this mechanism which is reassuring.
- Our workforce is fully trained in how to spot the signs of slavery. We have however asked our modern slavery partners for their online training along the three lines of defence model. This will be available later this year and will provide us with an annual training report for our workforce.
- An audit on our supply chain using Requests for Information followed up by calls to discuss the health of our supply chain concluded that there was no evidence of modern slavery in our supply chain but that there were several areas of concern which we need to attend to.
- There have been no instances of modern slavery within our business and as far as we are able to ascertain within our supply chain.
- We have negotiated a six month free trial for members of our supply chain including our social media followers to access our training materials and our other anti-slavery resources including our independently monitored whistleblower mechanism which they can do by contacting our modern slavery partners.

We have publicised our Modern Slavery Statement using social media and we have explained to our followers how the whistleblower mechanism works to encourage objective feedback.

**MODERN SLAVERY  
STATEMENT 2022**



John Piekos - CEO