



WWW.SAFEANDFREE.CO.UK

MODERN SLAVERY STATEMENT 2020/21

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

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



INTRODUCTION



Safe & Free is an anti-trafficking organisation, registered with the Charities Commission in 2012 (SAFE Networks charities number 1147308). We exist because Modern Slavery is the fastest growing crime worldwide, its rapid growth has been facilitated in no small part by its capacity to exploit and subvert legitimate business. Modern slavery has the capacity to impact almost all businesses, especially when we consider the length and complexity of modern supply chains. Modern slavery is a disgusting and depressing phenomenon but the really encouraging news is that it can be simply and comprehensively defeated by an informed and responsible approach to doing business. Businesses simply need to raise awareness, increase transparency, influence business culture and act proactively.

UK BUSINESSES WITH £36M+ TURNOVER

HAVE STATUTORY OBLIGATIONS TO PUBLISH A MODERN SLAVERY STATEMENT TO THEIR WEBSITE.

These businesses place anti slavery expectations onto their supply chain. In this way, each year more and more businesses are exposed to significant commercial pressures to join the fight against slavery. Safe & Free have been working with businesses, large and small to ensure that they are able to develop effective responses to modern slavery threats. Some smaller businesses find it difficult to resource Modern Slavery prevention amidst so many other competing operational priorities. We help businesses to build modern slavery approaches into existing priority workforce challenges (e.g. combining modern slavery and drugs/alcohol audit regimes). We also created and operate an independent monitoring mechanism which greatly increases organisational transparency.

We produce our modern slavery statement not because we are obliged to but because we believe that every business should be prepared to state what they are doing about modern slavery. We also believe that our position on modern slavery should be open and transparent for our prospective clients, our suppliers and for other interested parties. We want to provide these important stakeholders with an opportunity to provide us with feedback so if you have any concerns or observations about modern slavery or our modern slavery statement we would ask you to use this link to **LET US KNOW.**

ABOUT OUR BUSINESS

We rely upon our expertise in the identification, rescue and support of victims of human trafficking to develop resources designed to prevent Modern Slavery.



The knowledge and understanding we have gathered about how these crimes are perpetrated, also enables us to build effective preventative solutions for our business clients.

- 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.



As a growing social enterprise and registered charity, we rely upon committed individuals who are passionate about their anti-trafficking calling. All our staff, including our volunteers, hold high levels of awareness and understanding of the nature of Modern Slavery. The training that we provide, the nature of the work 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.

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 they post a sufficient Modern Slavery statement on their website. In addition, those suppliers that are judged to be at elevated risk of Modern Slavery are similarly asked to provide further information about the steps they have taken to increase their transparency or to mitigate those risks.

We will consider a wide range of challenges against any supplier that fails to demonstrate responsible action in respect to their perceived threat. These might include formal complaint, withdrawal of business relationship and even publication of our concerns to a wider audience.

OUR POLICY



We provide pragmatic, effective and innovative support for our prospective service users which includes:

- businesses wishing to act in a responsible MSA (Modern Slavery Act 2015) compliant manner;
- young people in care who are considered to be more vulnerable to CSE;
- and, those responsible for the education of young people so that awareness and prevention can be taught effectively when it is most needed.



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 new policies are written with the human trafficking threat in mind and we will review our policies annually to ensure that they are fit for purpose.



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.



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.

**NOBODY IS FREE
UNTIL EVERYBODY
IS FREE**



DUE DILIGENCE

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. One of the most important safeguards we enjoy comes from our continuous focus on Modern Slavery related issues. Any new member of staff is, first, formally inducted and then quickly and comprehensively immersed into a wide spectrum of knowledge about the way that this crime has, is and can be committed. Accordingly, it is accurate to say that our staff are hyper-vigilant on matters of Modern Slavery, CSE and Grooming.

Safe has implemented a whistle-blower service to increase transparency across our supply chain, to encourage ethical practice by our suppliers and gather information to provide reassurance that our supply chain threats are effectively mitigated.

MODERN SLAVERY ACTION PLAN 2020/21

We have mapped our business activities and identified those areas of our operations that have the greatest risk of exposure to a modern slavery threat. We have also checked for those factors that aggravate this threat. This enables us to prioritise our efforts at the areas of greatest risk. We continuously review our practice and learning to ensure that we remain vigilant to emerging modern slavery risks and can spot the signs.

We have made our existing policies Modern Slavery Act compliant. We will ensure that any new policies are written in a way which recognises inherent modern slavery threat.

Recognising that our commercial ability to influence our supply chain is weak, we utilise relationships with our larger clients to influence businesses with related interests. We will drive an agenda of inter-organisational collaboration between our clients. In this way we believe synergies can be unlocked and individual modern slavery responses are further strengthened at little or no additional cost. Collaboration is perhaps the most valuable weapon available to business in the fight against modern slavery.

We are encouraging wider uptake of our whistle-blower mechanism (SAFE Modern Slavery reporting). This mechanism increases transparency in business and across supply chains, at the same time providing clients and customers with confidence that they are procuring through a responsible MSA compliant business. All reports through this mechanism are collated and assessed in order that any learning might be extracted from the process. Additionally, the feedback provides valuable performance management information.

We maintain a risk register covering our supply chain and are continually reviewing the Modern slavery credentials of each of these suppliers. Where the suppliers do not publish an adequate modern slavery statement we make requests for information designed to test threats within these supplier businesses.

We have a rolling programme for requesting information from our suppliers, but we are proceeding with this process systematically, in order that we can spend additional time with any supplier that requires support meeting our expectations for supply chain transparency.

TRAINING

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.

MEASURING EFFECTIVENESS

The matrices that we will use to measure the effectiveness of our mitigation efforts through this year are as follows:

1. We will ensure that we have achieved the objectives outlined in our modern slavery plan.
2. We will receive, interpret and take appropriate action in respect of any reports received through our public audit tool.
3. We will identify the extent to which we have been able to influence the businesses within our supply chain.
4. We will identify the number of times we have positively influenced businesses which are in our extended network but which are not in our supply chain.
5. We will review our progress at the end of the year and we will produce an updated modern slavery statement and action plan for the year 2021-22.



Approved by the Board.

A handwritten signature in black ink, appearing to read "D Chapman". The letters are cursive and fluid.

Dave Chapman - Trustee

A handwritten signature in black ink, appearing to read "John Piekos". The signature is highly stylized and cursive.

John Piekos - CEO

safe
& freeTM

