



STOP THE TRAFFIK Group

MODERN SLAVERY HUMAN TRAFFICKING POLICY

July 2023

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STOP THE TRAFFIK is a Company Limited by Guarantee registered in England & Wales NO. 6657145 and a Registered Charity No. 1127321

Traffik Analysis Hub is a Company Limited by Guarantee registered in England and Wales No. 11451182 and a Registered Charity No. 1192933.

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Delegated Responsible Officer: Head of Operations

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Approvals:

This protocol required the approval of:
STOP THE TRAFFIK Group CEO: Ruth Dearnley
STOP THE TRAFFIK Group Director of Operations: Rebekah Lisgarten

Distribution:

This protocol is held in our team space on internal systems and was distributed to the entire STOP THE TRAFFIK staff (employees, part-time staff, trustees, service users, external consultants, partner organisations and volunteers) and trustees via email upon its launch.



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1. INTRODUCTION

STOP THE TRAFFIK Group (STTG) is committed to upholding and promoting the principles of human rights, regardless of race, sex, nationality, ethnicity, language, religion, or any other status, in all areas of our work. As part of our fight against the international crime of modern slavery and human trafficking, we are committed to taking effective measures to prevent, identify, and respond to any instances of modern slavery or human trafficking that may be connected to our operations or supply chain.

2. SCOPE

This policy applies to all aspects of our organisation, including employees, volunteers, consultants, partners, suppliers, contractors, and any other individuals or entities associated with STTG. This policy applies to all aspects of our operations, including programme implementation, advocacy, partnerships, and internal practices, and our supply chain.

3. STATEMENT OF COMMITMENT

Modern slavery and human trafficking are violations of human rights and an important global issue, with the [ILO reporting that 49.6 million people were living in modern slavery in 2021](#). As a charity working towards a just and equitable world, we are dedicated to ensuring that our activities and supply chains are free from any form of modern slavery such as forced labour, child labour and human trafficking. We are committed to upholding and promoting the highest ethical standards in all our interactions and partnerships.

4. DEFINITION

Definition within the UK:

Modern Slavery - is defined within the [UK Modern Slavery Act 2015](#) (the 'Act'), and is used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking.

Human trafficking - is where a person arranges, or facilitates, the travel of another person with a view to that person being exploited.

Definition by the United Nations Office on Drugs and Crime:

Human Trafficking - *“The Act of recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.”*

Definitions used by STOP THE TRAFFIK:

Modern Slavery - acts as an umbrella term, which covers a number of human rights abuses, of which human trafficking is one. It is mainly defined by the 1956 UN Supplementary Convention which says: ...debt bondage, serfdom, forced marriage and the delivery of a child for the exploitation of that child are all slavery-like practices and require criminalisation and abolishment...

Modern slavery cases include two elements, means and purpose, and encompass:

- Slavery
- Human trafficking
- Servitude
- Forced or compulsory labour

As defined by the Palermo Protocol, human trafficking includes three elements:

- Movement or recruitment by;
- Deception or coercion for;
- The purpose of exploitation.

Trafficking adds this third element of moving a person from one place to another.

Traffickers use whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, servitude, and inhumane treatment.

5. RESPONSIBILITIES

STTG Leadership - The leadership of STTG, including all Directors, is responsible for setting the tone, culture, and strategic direction of our work. They are accountable for integrating modern slavery and human trafficking principles into our policies, programmes, and practices. Leadership seeks external expertise as needed, if appropriate.

Board of Trustees - The Board of Trustees of STTG has a responsibility to ensure the effective implementation of the modern slavery and human trafficking policy and to provide guidance and oversight.

Staff and Volunteers - All staff members and volunteers are expected to read and understand the contents of this policy, follow its principles, and integrate modern slavery and human trafficking considerations into their work.

Partners, Clients, and Suppliers - We seek to collaborate with partners, clients and suppliers who share our commitment to identifying and eliminating modern slavery and human trafficking and who demonstrate respect for these principles in their actions and operations.

6. PREVENTION AND DUE DILIGENCE

Supplier and Partner Assessment - We will conduct due diligence on our suppliers, partners, and contractors to ensure they share our commitment to combatting modern slavery and human trafficking. This will involve scrutinising their policies, practices, and compliance with applicable laws and regulations, before and during our partnership with them

Awareness and Training - We will provide appropriate training to our staff and volunteers to raise awareness about the risks of modern slavery and human trafficking and equip them with the knowledge and skills to identify and report any suspicious activities, including a mandatory awareness video for all new joiners.

Contractual Obligations - Our agreements with suppliers and partners will include specific clauses prohibiting any involvement in modern slavery or human trafficking and outlining the consequences of non-compliance.

7. COMPLIANCE AND MONITORING

Compliance Review - We will annually review and evaluate the effectiveness of this policy, ensuring that it remains aligned with evolving modern slavery and human trafficking human rights standards, best practices, and emerging challenges. Updates and revisions to the policy will be made as needed.

Risk Assessment - We will conduct periodic risk assessments of our operations to identify and address vulnerabilities related to modern slavery and human trafficking. The outcomes of this can be found in our annual Modern Slavery Statement reporting.

External Collaboration - We will actively engage with other organisations, government agencies, and NGOs to collaborate on initiatives and share best practices to combat modern slavery and human trafficking effectively.

8. IDENTIFICATION AND RESPONSE

Reporting and Investigation - Any suspicions or reports of modern slavery or human trafficking will be promptly and thoroughly investigated by HR. We will collaborate with law enforcement agencies and other relevant authorities to ensure appropriate actions are taken.

Whistleblowing Mechanism - Employees, volunteers, or any concerned individuals can report instances of MSHT internally to our Head of or Director of Operations, confidentially. If a team member needs to report to someone external, we have a Human Resources team within our parent company that staff can approach confidentially. Finally, STTG runs the STOP APP, an anonymous, confidential app where team members could report incidents of MSHT if appropriate.

Remediation - If there was ever a case of instances of modern slavery or human trafficking found within our operations or supply chain, we would work diligently with the concerned parties to develop and implement effective remediation plans.

8. REVIEW AND REVISION

We will annually review and evaluate the effectiveness of this policy, ensuring that it remains aligned with evolving modern slavery and human trafficking standards, best practices, and emerging challenges. Updates and revisions to the policy will be made as needed and communicated to relevant parties via email with a link to the updated policy.



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