



**STOP THE TRAFFIK Group**

# **MODERN SLAVERY STATEMENT**

## **2022 - 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.

## **STATEMENT FROM THE BOARD OF DIRECTORS AND CEO**

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STOP THE TRAFFIK was founded in 2005, when we launched a two-year campaign to coincide with the abolition of The Slave Trade Act 1807. At that time, we had a vision to not only change the narrative around modern slavery and trafficking but to disrupt the very systems on which they rely. Since then, our reach and influence as a collective has grown significantly, as we have developed partnerships with businesses, financial institutions, governments, NGOs, law enforcement, academia, and many other global influencers.

We have developed vital tools to aid our intelligence-led approach. Our Traffik Analysis Hub is the largest database of trafficking information currently in existence and our STOP APP provides the ability for anyone to submit an anonymous report of a potentially exploitative incident. STOP THE TRAFFIK's strategy revolves around three key pillars: recruitment, money, and demand. This holistic approach is about reducing the number of people who are vulnerable to trafficking, preventing traffickers from moving money through financial systems and enabling businesses to reduce the modern slavery risk within their operations.

Unfortunately, the global imperative around trafficking has grown and the urgency to stop it at source has never been greater. Climate change, natural disasters and conflict will continue to drive people from their homes at alarming rates, placing whole communities in vulnerable situations that play directly into traffickers' hands.

Our mission is to meet this challenge head on and change the system that enables traffickers to flourish. We are relentless in our pursuit of this goal; we are restless in our desire for that change, and we will not stop until we have made the business of trafficking unprofitable. Systemic change requires continual evolution and an acknowledgement that long-term reform is only possible through trust. We recognise that our goals are within reach because of the trust we have built with the people around us; our partners, clients, suppliers and staff. This trust is our currency, and we invest in being transparent about our impact and our progress. We measure our success not only by our impact in the world, but by our commitment to constant improvement and why we are striving for it. We make this same commitment to our staff because our people matter just as much as how we achieve our objectives.

This Modern Slavery Statement has been published in accordance with Section 54 of the Modern Slavery Act (2015), covering the period 1st September 2022 – 31st August 2023, STOP THE TRAFFIK's financial year. Although STOP THE TRAFFIK is not legally required to comply with Section 54, we have decided to voluntarily publish this statement to promote transparency in our approach to prevent modern slavery and human trafficking within our operations and supply chain.

**Date of Board approval:**

**Date of CEO sign-off:**

## **STRUCTURE AND BUSINESS**

STOP THE TRAFFIK is a charity registered in England and Wales (1127321) and a company limited by guarantee (6657145). STOP THE TRAFFIK is a legal subsidiary of Oasis Charitable Trust (Oasis) a registered charity (1026487) and a company limited by guarantee (2818823), which provides holistic support to transform local communities around the world. Oasis, as our parent company, works in communities affected by inequality to create change-economically, socially, physically, spiritually; in education, housing, justice, health, youth, and family support; with people of all ages and in all situations.

STOP THE TRAFFIK, including the entities STOP THE TRAFFIK and Traffik Analysis Hub (TA Hub), operates from a London-based office and employs 17 people, as of December 2023, and has benefitted from 5000+ hours of volunteer and pro-bono support in the last year.

The STOP THE TRAFFIK Board of Directors have delegated day-to-day management of the company to the CEO but retain responsibility for major strategic and governance issues. The Operations Team holds a risk register that is reviewed and updated on a regular and ongoing basis. STOP THE TRAFFIK has a Risk and Audit Committee that we report into quarterly where the committee reviews the entire risk register and mitigating actions.

STOP THE TRAFFIK provides consultancy services to businesses, financial institutions, and the public sector, runs intelligence-led prevention and awareness-raising campaigns, and operates the world's most comprehensive data source related to human trafficking, the TAHub. The entirety of STOP THE TRAFFIK's work aims to prevent and eventually eradicate modern slavery and human trafficking. To that end, we further recognise our responsibility to address the risk of modern slavery and human trafficking in our own operations and supply chain. In 2022-2023, STOP THE TRAFFIK received a total income of £1,134,342. Income is generated through 3 income streams: grants, earned income (intelligence services), and donations.

## **SUPPLY CHAINS AND RISK ASSESSMENT**

As an office-based organisation in London, STOP THE TRAFFIK has two primary ways it can be exposed to modern slavery: its workforce and its supply chains.

- Although we have low level of risk of modern slavery within our workforce, we recognise the importance of preventing exploitative practices across our people lifecycle. In the hiring stage, we continue to manage this risk by committing to internal recruitment and to use the UK's largest charity recruitment specialists, Harris Hill, for any roles which might be difficult to fill and tend to be highly specialised or senior roles. In this statement, we also risk reviewed our onboarding process to understand if all new employees were receiving transparent and easy-to-understand offer letters. Having completed this review, we determined that all new employees are receiving this information however not within the same timeframe. In our 2023-2024 statement, we intend to implement an updated process in which new staff follow a standardised onboarding timeline.

- To better understand the potential risk STOP THE TRAFFIK might face in our supply chains, we have conducted a detailed supply chain risk mapping, using our own established supply chain risk mapping methodology, to identify the high-risk sectors in our tier 1, or direct, supply chain consisting of 44 suppliers.
  - STOP THE TRAFFIK's risk mapping methodology consists of ranking each supplier on a scale of 1 to 5 based on their economic sector and country of operation, where 1 is the lowest risk of modern slavery and human rights abuses, and 5 is the highest. These scores are determined by a combination of multiple open-source datasets and qualitative analysis from STOP THE TRAFFIK's consulting and intelligence teams.
  - In our assessment, we found that overall STOP THE TRAFFIK has low risk of modern slavery across its direct suppliers, with 0 suppliers rated as a 4 or 5. 41 suppliers ranked either a 1 or 2 level risk. Of these suppliers, the majority are based in the UK and provide professional services, which in combination are inherently lower risk for modern slavery. 3 of the 44 suppliers, however, are a moderate risk, or a 3-level risk ranking, which is driven by their country of operation (Turkey and Colombia). Given the nature of our work, it is necessary for STOP THE TRAFFIK to work directly with organisations in high-risk jurisdictions. Regardless, we recognize the importance of mitigating potential harm caused by our business. As such in our 2023-2024 statement, we intend to conduct additional due diligence on these 3 suppliers to determine if any further remediation action is necessary.

STOP THE TRAFFIK is a subsidiary of Oasis, so a significant proportion of our procurement is operated by Oasis and was not part of our risk assessment. Oasis's unique relationship with us[RL1] makes understanding their modern slavery risk a priority. For our 2024-2025 statement, we intend to conduct a risk assessment of Oasis's procurement process to evaluate how their suppliers pose a risk to STOP THE TRAFFIK's supply chain.

The relevant supplier policies that STOP THE TRAFFIK has ensures suppliers' compliance with national and international labour laws as well as our own policies:

- **Purchasing and Tendering Policy**

- This policy outlines the framework and processes for purchasing activity to which all STOP THE TRAFFIK employees must adhere and signposts these relevant policies and procedures such as the **Supplier Code of Conduct** and the **National Procurement Manager +£25,000 Tender Consultation for Purchase**.
- This policy was reviewed, updated, and distributed to Oasis National Finance Teams in March 2021.
- The **Supplier Code of Conduct** is in Appendix 5 of the Purchasing and Tendering Policy and is aligned with STOP THE TRAFFIK's Code of Conduct and outlines the

expectation of suppliers to agree and adhere to in their operations and supply chain. This includes upholding wages, working hours and healthy working conditions, and ensuring no underage or forced labour.

- This policy was reviewed, updated, and distributed to Oasis National Finance Teams in March 2021.

## **POLICIES**

Since STOP THE TRAFFIK is a subsidiary of Oasis Charitable Trust, the group's policies are applicable to our organisation. All STOP THE TRAFFIK employees have access to these policies, available in English, via the Oasis or STOP THE TRAFFIK internal online portal. If we were to hire a role that did not require a minimum level of English, we would translate our policies for these team members.

Last year STOP THE TRAFFIK recognised that it did not have a Modern Slavery and Human Trafficking Policy or a Human Rights Policy. To outline our commitment to ensuring the protection of all those in, and impacted by, our operations and supply chain we have created our own Modern Slavery and Human Trafficking Policy and Human Rights Policy.

- **Modern Slavery and Human Trafficking Policy**

- This policy outlines our organisation's commitment beyond our mission to prevent all forms of modern slavery within our operations and supply chain. This includes the responsibilities of all STOP THE TRAFFIK staff (employees, part-time staff, trustees, service users, external consultants, partner organisations and volunteers) to integrate modern slavery considerations into their work and our due diligence and prevention work towards this in line with our mission.
- This policy applies to all STOP THE TRAFFIK staff (employees, part-time staff, trustees, service users, external consultants, partner organisations and volunteers), and any updates will be communicated via email.
- This policy will be annually reviewed and updated where necessary.

- **Human Rights Policy**

- This policy outlines our commitment beyond our mission to promote, protect and respect the human rights of all in our operations and supply chain. We are fully committed to ensuring that human rights are respected through our work and operations, this policy further outlines our staff responsibilities and mechanisms to develop knowledge and reporting on adverse human rights impacts.

- This policy applies to all STOP THE TRAFFIK staff (employees, part-time staff, trustees, service users, external consultants, partner organisations and volunteers), and any updates will be communicated via email.
- This policy will be annually reviewed and updated where necessary.

The other relevant policies for this statement are as follows:

- **Oasis Code of Conduct**

- This policy outlines the responsibilities and expectations of all staff (employees, volunteers, and agency workers, directly engaged contractors) to work within professional boundaries at STOP THE TRAFFIK. This Code of Conduct is supported by several individual policies, such as anti-bullying and equality and diversity, that outline employees' obligations to be inclusive and non-discriminatory towards each other and where they can access support.
- The Code of Conduct applies to all STOP THE TRAFFIK employed staff (employees, volunteers, and agency workers, directly engaged contractors).
- All employees are required to read the Code of Conduct in their induction.
- This policy is planned to be updated each year and changes will be consulted on with recognised trade unions. The most recent version was updated in 2020.

- **Safeguarding Adults at Risk Policy and our Safeguarding and Child Protection Policy**

- These policies outline the responsibility of anyone who works or volunteers at STOP THE TRAFFIK to promote and safeguard the mental, emotional, and physical welfare of adults and children, particularly those whom they come into contact with. All STOP THE TRAFFIK employees and relevant volunteers must complete online safeguarding and child protection training as part of their induction, this includes a section on awareness of child trafficking and modern slavery.
- These policies were recently updated for all STOP THE TRAFFIK employees in May 2023 and are available to all team members centrally in internal systems. They can also be accessed by the public and service users upon request.

- **Whistleblowing Policy and Grievance Procedure**

- This policy encourages and supports employees, volunteers, directors, temporary, casual and agency staff to internally report and raise concerns within STOP THE TRAFFIK operations, regardless of their position in the organisation. A clear mechanism is established for all STOP THE TRAFFIK staff to raise concerns and grievances such as criminal offences, misconduct, or malpractice.

- All written concerns are investigated by the Oasis UK HR Manager and an external auditor, where relevant.
- The policy encourages employees to put their name to their concerns, as concerns anonymously expressed are less capable of being effectively followed up, but they are considered.
- This policy is publicly available [here](#).

- **Recruitment and Selection Policy**

- This policy reflects STOP THE TRAFFIK's commitment to attracting, recruiting, and retaining the best people in the organisation. This follows the Oasis Community Learning Recruitment Toolkit that outlines legislation, what checks should be done, and intends to remove discrimination from the recruitment process. STOP THE TRAFFIK will not employ people who do not meet the legal requirements for employment in the UK, where the STOP THE TRAFFIK office is based, to build resilience to criminal activity such as human trafficking.
- Right to work checks are carried out on all STOP THE TRAFFIK staff (employees, apprentices, agency/supply staff, casual workers, volunteers, peripatetic staff, contractors, consultants, trustees).
- This policy is updated every year on the internal policy portal.

- **Grievance and Bullying and Harassment Policy and Procedure**

- This policy supports the EDI Policy as it outlines the moral and legal responsibilities of STOP THE TRAFFIK, providing a supportive and accessible framework for staff to raise concerns about personal bullying. This policy applies to all STOP THE TRAFFIK staff (employees and workers supplied via an agency or on casual contracts, trainees, and apprentices) and outlines the formal grievance procedure and the timeline for internal investigation and external review, if relevant.
- This policy was reviewed and updated with the most recent update published in July 2022.

- **STOP THE TRAFFIK Equality, Diversity, and Inclusion (EDI) Policy**

- This policy outlines the duties of STOP THE TRAFFIK staff (employees, part-time staff, trustees, service users, external consultants, partner organisations and volunteers) to treat each other with dignity and respect in accordance with our ethos and strictly prohibits any form of discrimination. This policy is aligned with the Equality Act 2010 where legal obligations intend to avoid any and all unlawful discriminations against any individuals in employment on the characteristics of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex or sexual orientation.

## Policy Review:

- All the above-mentioned policies are reviewed and regularly updated and approved by the STOP THE TRAFFIK Executive Team, and the Oasis Charitable Trust Board of Trustees and Directors Group where relevant. The most up-to-date policy version is always available on internal workspaces. For changes to role-specific policies, the relevant employees and suppliers are also notified.
- These policies will be accessible in English on STOP THE TRAFFIK's online team space and distributed to our workforce via email upon their initial publication.

## ENHANCED DUE DILIGENCE

At STOP THE TRAFFIK we recognise the importance of due diligence in identifying, mitigating, and responding to modern slavery and human trafficking in our supply chain. We encourage our partner organisations and clients to adopt enhanced due diligence procedures and similarly continue to implement these frameworks in our own operations and supply chain.

### • **Partner Organisation and Client Due Diligence Guide**

- STOP THE TRAFFIK use a due diligence guide, accessible on our team internal workspace, for both the clients we advise and the organisations we partner with to determine their level of modern slavery risk and how this risk will inform our working relationship. These checks are conducted online through collaborating with the organisation and establishing written agreement on the shared values and expectations of both sides.
- We train all STOP THE TRAFFIK staff on the steps of this due diligence guide annually.

### • **Internal Reporting Procedure**

- STOP THE TRAFFIK does not directly have an internal mechanism for reporting modern slavery and human trafficking, as we do not yet have a Modern Slavery and Human Trafficking Policy that outlines this procedure.
- However, STOP THE TRAFFIK does have internal reporting procedures outlined in several policies above, such as the whistleblowing policy, where STOP THE TRAFFIK staff can report concerns internally.

### • **Supplier Onboarding**

- Oasis has a New Supplier Policy that aims to ensure all suppliers are thoroughly vetted before entering a commercial relationship. The vetting procedure includes new suppliers' completion of the New Supplier Form including a GDPR test, HMRC test and Supplier Finance Assessment Form.



- Under the Oasis Purchasing and Tendering Policy, all suppliers must comply with national laws including the International Labour Organisation (ILO), not tolerate or use any form of slavery in their supply chain, and meet legal minimums for wage, benefits and working hours. Oasis suppliers must be able to demonstrate compliance with the Oasis Supplier Code of Conduct, this includes documented evidence and the right of Oasis or a designated firm to conduct audits.
- Oasis uses a government supplier registration tool to assess the modern slavery and human trafficking risk of the one national supplier of cleaner.

## **TRAINING**

The majority of STOP THE TRAFFIK staff are experts in delivering modern slavery awareness training to stakeholders. We recognise the importance of STOP THE TRAFFIK staff receiving modern slavery awareness and other training as part of our individual responsibility to prevent modern slavery and human trafficking in our operations and supply chain so we can successfully support our clients.

- **STOP THE TRAFFIK staff trainings:**

- EDI Training
  - STOP THE TRAFFIK has an appointed EDI Champion who holds regular reviews of the team's EDI action plan and leads a series of organisation-wide training for all staff.
  - 100% of full-time STOP THE TRAFFIK employees have attended the online EDI training module - Introduction to EDI.
  - This training intends to educate all STOP THE TRAFFIK staff on how to eliminate discrimination, victimisation, and harassment to create a safe and inclusive working environment.
- Introduction to Modern Slavery and Human Trafficking
  - This mandatory training is included in the induction for all new starters at STOP THE TRAFFIK.
  - 100% of STOP THE TRAFFIK employees have completed an online training video, available on our internal workspace, on the general introduction and awareness of modern slavery and human trafficking.
  - This training intends to outline the main types of modern slavery and human trafficking, develop an understanding of methods of coercion, educate all STOP THE TRAFFIK staff on how to spot the signs and provide signposts for those at risk and those in supporting roles to further prevent modern slavery and human trafficking.

- Dealing with Distressing Content
  - 100% of all STOP THE TRAFFIK employees have completed an online or in-person training on Dealing with Distressing Content.[AS1]
  - This mandatory training is included in the induction for all new starters at STOP THE TRAFFIK to signpost support for sensitivity and safeguarding issues that will arise from their exposure to modern slavery and human trafficking content as part of their role at STOP THE TRAFFIK.
  
- Procurement team modern slavery and human trafficking training
  - 100% of the Oasis Procurement team has undertaken an e-learning module on Modern Slavery, created by Flick Learning, in the past 12 months.
  - This is a CPD-certified e-learning course for those working in any safeguarding capacity. It covers The Modern Slavery Act 2015 and how to recognise and act on concerns of modern slavery and human trafficking.

## KEY PERFORMANCE INDICATORS (KPIs)

We have chosen to voluntarily publish this 2022-2023 statement to highlight our continued mission and commitment to globally prevent modern slavery and human trafficking. To measure our effectiveness and progress in mitigating and addressing these issues in our own operations and supply chains, we have created key performance indicators (KPIs) for transparency and accountability.

Risk Area	Mitigations	KPIs	Next Steps
Supply Chain	Supply Chain Due Diligence	100% of STOP THE TRAFFIK moderate-risk tier 1 suppliers will be reviewed.	Any moderate-risk tier 1 suppliers identified in the risk mapping will be reviewed and investigated in line with the Partner Organisation and Client Due Diligence Guide created in 2022.
Awareness	Trainings	100% of STOP THE TRAFFIK employees attended a general MSHT training.	STOP THE TRAFFIK will annually provide updated training for employees on the evolving issues and awareness of MSHT.
		50% of STOP THE TRAFFIK volunteers received general MSHT training.	In 2023-2024 we will embed a MSHT general awareness training in our online onboarding pack for all volunteers to access.

		The average number of STOP THE TRAFFIK employees who have self-reported high confidence in reporting incidents of modern slavery and human trafficking through available internal and external mechanisms.	We will survey staff on their self-reported confidence on reporting MSHT incidents bi-annually, at minimum.
Employees	Policies	The average number of STOP THE TRAFFIK employees who have self-reported high confidence in accessing and knowing Oasis and STOP THE TRAFFIK policies.	STOP THE TRAFFIK will remind all team members where to access organisational policies annually, as well as upon any new starter joining the team.
		100% of STOP THE TRAFFIK employees are aware of our Modern Slavery and Human Trafficking Policy and Human Rights Policy.	STOP THE TRAFFIK will re-circulate our Modern Slavery and Human Trafficking Policies to ensure all team members have access to the information and update as necessary.
	Contracts	100% of STOP THE TRAFFIK employees received a contract before starting work.	We will review our HR policies and recruitment procedures.



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