

Modern Slavery PEC safeguarding policy

Contents

Purpose	2
Definitions	2
Adults at risk.....	2
Person with lived experience of modern slavery	2
Peer researchers	2
Survivor leaders	2
Incident.....	3
Empowerment.....	3
People with lived experience	3
Staff members	4
Training.....	4
Safeguarding champion	4
Team approach.....	4
Meeting rules.....	4
Prevention.....	5
Incident response	5
Consent.....	5
Immediate threat of danger/significant harm	6
No immediate threat of danger/significant harm.....	6
Referral process	6
Proportionality	7
Protection.....	7
Partnership	7
Accountability.....	8
BIICL Policy.....	8
Referral processes	8
Incident log	8
Review	8
Annex 1 – Consent form	9
Annex 2 – meeting rules	12
Annex 3 – sample incident log	13

Purpose

The structure of this policy will be to cover six key elements of safeguarding: empowerment, prevention, proportionality, protection, partnership and accountability. The reasoning for doing so is to ensure that we have a holistic policy that works for both our staff members and those that we interact with who might be vulnerable.

The aim of this policy is to prevent harm, protect members of staff and those that we engage with and to understand accountability within the team. This policy covers the safeguarding of vulnerable adults only. Should the Modern Slavery PEC start to engage with children (aged 18 and under), this policy will be reviewed.

Definitions

Safeguarding is defined as taking all reasonable means to prevent harm from occurring; to protect people, especially adults and children at risk, from that harm; and to respond appropriately when harm does occur.¹ Within the Modern Slavery PEC, we are at an increased risk of encountering adults at risk, including those who have lived experience of modern slavery. Our safeguarding duties may also extend to anyone directly affected by our research activities, this could include those carrying out research, engaging with our research outputs, submitting ideas to the research ideas form, or working with us in the Lived Experience Advisory Panel.

As funders of research projects, and as researchers ourselves, this policy will cover, but is not limited to, adults including: consultants, research participants, (peer) researchers, staff (both those who have lived experience of modern slavery and others), and partners. Those who work with the Modern Slavery PEC, such as funded researchers, are welcome to adopt this policy for the course of their work if they do not have an appropriate safeguarding policy.

Adults at risk

An adult at risk is a person “who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.” (Care Act 2014)

Person with lived experience of modern slavery

This encompasses anyone with lived experience of modern slavery, whether the individual has been through the National Referral Mechanism (NRM) or has not. The term person with lived experience is used as shorthand to represent those who identify as either victims or survivors (or both), and all three terms will be used as appropriate in this document.

Peer researchers

Peer researchers refers to people with lived experience who act as researchers on a piece of work. They may not have formal qualifications, such as a PhD.

Survivor leaders

Survivor leaders is a term used to refer to those who have exited exploitation and act as representatives to actively contribute to anti-slavery efforts.

¹ <https://www.ukcdr.org.uk/what-we-do/our-work/safeguarding/>

Incident

For the purposes of this policy, an incident includes, but is not limited to, a disclosure made to a Modern Slavery PEC staff member that the member of staff feels contains an element of risk of physical or mental harm to the individual making the disclosure, a member of staff or a third party.

For the purposes of this policy, we would not consider a discussion of a historic experience of modern slavery, where the individual is no longer in the situation and is not at risk to their physical or mental health as a disclosure. However, if such a discussion were to trigger a health issue (e.g., causing distress, mental health issues or a physical reaction) or were to cross a threshold by which the Modern Slavery PEC needs to share details with a third party (see confidentiality), then this would be considered an incident.

An incident also includes any complaint made either by a member of staff at the Modern Slavery PEC or by an external individual, made in relation to either a member of staff at the Modern Slavery PEC, a member of a Modern Slavery PEC research team (both AHRC or directly funded), a Senior Management Board member, an Advisory Group member, a member of the Lived Experience Advisory Panel or a member of any other working group or committee that should be established by the Modern Slavery PEC. The complaint must be in relation to the individual's work with the Modern Slavery PEC. The complaint may be made to a member of staff at the Modern Slavery PEC or to a member of the Survivor Organisation Working Group (for more detail see the Partnerships section below).

Empowerment

Empowerment covers both the empowerment of those that we work with and of our staff. Please note that, following the hiring of our Lived Experience Manager and Lived Experience Coordinator, and the establishment of the Lived Experience Advisory Panel, there will be members of staff who also have lived experience of modern slavery.

People with lived experience

As part of our core activities, we work to incorporate people with lived experience across all stages of our work. This work is captured across multiple policies including: the Lived Experience Advisory Panel Terms of Reference, partnership strategy, monitoring & evaluation strategy, equality, diversity & inclusion strategy, and research.

With regards to safeguarding activities that will support this work, we commit to:

- Ensuring that informed consent is given for any work that the Modern Slavery PEC is undertaking where we decide there is an increased risk of harm (e.g. reading potentially sensitive funding applications or asking an adult at risk to write a blog for us), by sharing this policy with any adult at risk who we will work with, explaining the full process that we wish for them to engage with (either in writing or verbally, as appropriate for the individual we are working with). If you are unsure whether your activity constitutes an increased risk, contact the Safeguarding Champions (see below). Consent shall be recorded in the consent form, see Annex 1.
- Listening to the voices of adults at risk and incorporating them in a reasonable and proportionate manner. This could include, but is not limited to, the research ideas form, facilitating involvement as peer researchers, testing funding call scopes, acting as panel members, acting as experts offering advice on funding or on outputs
- The right to remove yourself, where reasonably practical, from contributions (temporarily or permanently), without any disclosure required, without prejudice to

any future work. Please note, this may not be possible in all cases, for example summaries taken from group discussions or blogs hosted by third parties.

- Not asking for stories of trauma or experiences of modern slavery, instead working with people with lived experience as experts. This means that the basis of our engagement with people with lived experience will be to request their expertise on the work of the Modern Slavery PEC. In any instance where there is a risk that experiences of modern slavery might be discussed, as far as possible, people with lived experience should be given prior notice.

Staff members

With regards to our members of staff, we will support them through:

- 1) Survivor Ally training
- 2) Safeguarding training
- 3) Any additional training offered by BIICL
- 4) Modern Slavery PEC Safeguarding Champions (see below)
- 5) Right to remove yourself from situations without query
- 6) Team commitment to discussions on prominent issues

Training

All members of staff at the Modern Slavery PEC must read the policy and confirm in writing that they have understood it.

All staff will attend training sessions on safeguarding. Two members shall be “Safeguarding Champions.” These safeguarding champions and Senior Leadership Team shall have undertaken training, making them appropriate first points of contact should an incident arise. They will also have responsibility for maintaining the incident log (see Annex 3).

Any external training courses being offered to Modern Slavery PEC staff, where adults at risk might attend, will be contacted ahead of training, explaining that there might be adults at risk in the course, and sending the trainer the Modern Slavery PEC’s meeting rules. The right to anonymity and to remove yourself from the meeting will still apply. The Safeguarding Champions will co-ordinate vetting any training being run for the Modern Slavery PEC team, including that which is organised by BIICL.

Safeguarding champion

Two members shall be “safeguarding champions”, they will undertake training and will be available to team members should questions arise when working with individuals (see referral process). They shall also be responsible for maintaining the incident log.

Safeguarding champions will be in place for a year and may request to step down at this time, this is to recognise the additional burden, both in terms of working hours and the potential impact on mental health, that the role could take. The initial term shall run from 1 March 2022- 28 February 2023.

Team approach

We understand that modern slavery is a real-world issue and the experiences that we will encounter during our time at the Modern Slavery PEC might have an important impact on us. As a team, we will make space to have honest and frank conversations about the issues that arise around modern slavery and linked issues with all members of staff having the option to be involved or remove themselves from conversations.

Meeting rules

All staff and external attendees will adhere to the meeting rules in Annex 2. This will apply to all meetings being hosted by the Modern Slavery PEC. Where meetings are being hosted by

an external, where appropriate (for example where we are aware that an adult at risk is attending), the Modern Slavery PEC team will send these meeting rules to external hosts ahead of meetings.

Prevention

The mission of the Modern Slavery PEC is to protect people from modern slavery through ensuring policies are grounded in evidence. Therefore, much of our research and work will be working towards this element of safeguarding.

We commit to funding research in the area of prevention, as per our strategic delivery plan, and to reflect on this research as a team, incorporating learning from it into our practices, and this policy, as appropriate.

Incident response

There may be incidents (defined above) where an adult at risk who we interact with might be at an immediate risk of danger. Whilst it is better to prevent harm earlier in the cycle, the following steps will be taken for an immediate risk.

If a disclosure of modern slavery is made to you during the course of your work, ensure that the safety of yourself and the adult at risk is first priority. Given the remote nature of much of our work, potential disclosures are likely to be made online. However, should a disclosure happen in person, and there appears to be an element of risk, the safety of the victim and the professional is the priority.

Key principles for responding to an incident:

- Remain calm and offer reassurance that they have done the right thing in telling you
- Listen attentively and assure them that you are taking their report seriously
- Try to avoid interrupting the individual, making any conclusions or asking leading questions, let them explain the incident in their own words
- Explain the Modern Slavery PEC's consent procedures, it is ok to pause and read out the section below to them
 - Do not promise confidentiality without explaining that there are situations in which we would be legally obliged to share information
 - Explain that you are required to share this information internally, but can anonymise the incident, as far as possible, if preferred by the individual
- Explain what you will do next, decide what to do based on what you feel comfortable with, if you are not sure, always contact the safeguarding champions or a member of Senior Leadership Team first

If you need guidance or help, contact the safeguarding champions and, if they are not available, or are not appropriate to contact (for example if the incident involves them), a member of the Senior Leadership Team.

It can be distressing to hear about people's experiences of trauma. If you need advice or support, please reach out to the safeguarding champions or members of Senior Leadership Team. BIICL runs an Employee Assistance Programme, a service that provides confidential help at any time. This is a completely confidential service and can be contacted via www.healthassuredeap.com or on 08000305182.

Consent

As an organisation, we have a common law duty of confidentiality. This means that, when someone shares personal information with us in confidence, we must not disclose this

externally without legal authority or justification. This duty still applies even if an individual is vulnerable, and mental capacity to make decisions should be assumed. In practice this means that, in order to share confidential information externally, you should need one of the following bases:

- 1) Express consent (an individual must have capacity to give consent, meaning that they understand what they have consented to, ideally using the consent form in Annex 1)
- 2) Where reporting the information is necessary to safeguard the individual, or others, or is in the public interest
- 3) Where there is a legal duty to do so, for example a court order

If you feel that reporting the incident might be necessary, first speak to the individual to see if they consent to this. If they do not consent, explore their reasons and explain what your concern is and why you think it's important that the information is shared. If they do not provide consent, but you think that the disclosure might fall into the second category, you must immediately contact the Safeguarding Champions and/or a member of the Senior Leadership Team as a solid justification will be required, and we might be required to seek legal advice.

If you have to share personal information, you must inform the individual of the information you are reporting, and explain why and to who you are sharing this information. Any information that is disclosed must be kept to a minimum to achieve the necessary purpose (e.g. do not include superfluous details).

Immediate threat of danger/significant harm

Before taking action, read the section above on consent.

In the UK - contact the police on 999

Overseas – if the contact is overseas but their disclosure relates to information that relates to criminal activity in the UK, contact the police on 999. If the activity is taking place overseas, advise the individual contacts their local legal enforcement agency as a matter of urgency.

Following the incident, please follow the referral process, below.

No immediate threat of danger/significant harm

Before taking action, read the section above on consent.

Contact the Safeguarding Champions and/or a member of the Senior Leadership Team (should the incident include a Safeguarding Champion) to discuss the next steps as per the referral process, below.

There are a number of options that can be taken:

- Non-urgent police number 101
- Crimestoppers: 0800 555 111
- Modern Slavery helpline: 0800 0121 700

Following the incident, please follow the referral process, below.

Referral process

Where an incident has occurred, this must be referred on to the safeguarding champions. If the incident includes one or more of the champions, the incident must be referred to a member of the Senior Leadership Team.

See the [full steps for referrals](#) below.

Proportionality

All safeguarding actions will be proportionate to the level of risk and responsive to the needs and feedback of people with lived experience. As the primary engagement with vulnerable people will be engaging them as experts in the field, we should be aware of our conduct in relation to the individual, but also that they might raise safeguarding incidents that are external to their role with the Modern Slavery PEC. We will review the proportionality of the steps being taken upon hiring the Lived Experience Manager.

Should we enter a situation where we are engaging with someone with lived experience in relation to their experience of exploitation, this will be raised with the safeguarding champions and Senior Leadership Team, to ensure that the approach, response and safeguards are proportionate. Decisions and responses will be recorded in the incident log to ensure consistency over time.

Protection

We will support and represent those with lived experience of modern slavery. This includes involving them in our work and the work of our delegated research. As far as is possible, we will protect those working on our research by:

- Asking research and funding applicants to submit a safeguarding plan to set out how they will work with those with lived experience
- Only refer on a person with lived experience to a research project where we know the project has ethical approval and has made appropriate safeguarding considerations
- Include warnings where there is sensitive or potentially distressing content in our outputs, including documentation circulated internally, as well as external outputs, limiting this as far as is possible and practical
- Preserve the anonymity of people with lived experience who engage with us in line with individual preferences and to the extent feasible, for example, by offering the option to remove full names, use pseudonyms, or keep cameras off during online meetings

Partnership

We will work in partnership with other experts in the area of modern slavery to continuously improve our work and approach. This might include, reading and discussing Modern Slavery PEC funded research in this area, taking part in external workshops, listening to talks, seeking out and learning from established good practice or inviting experts to comment on policies and proposals. We will feed this information back to the team and aim to set an example of best practice in the sector.

We will establish a Working Group of survivor-led and survivor-engaged organisations, who will guide and advise the Modern Slavery PEC in our survivor engagement work, enabling that work to draw on a breadth of experience and expertise from across the anti-slavery sector.

We will create a section on our website that sets out how and why we are working with people with lived experiences, the safeguards that we have in place, and any resources that we use to enable participation.

Accountability

BIICL Policy

The BIICL Safeguarding policy covers our rights as employees of BIICL should we need to raise complaints or concerns within the organisation. See the BIICL policy for full information.

Referral processes

When a safeguarding incident arises, the following process should take place:

- 1) Write up of the incident and action taken (e.g. advice given, actions taken), ensuring that the report covers the areas of the incident log (Annex 3)
- 2) Inform the safeguarding champions or, if the incident includes one or both safeguarding champions, inform a member of the Senior Leadership Team
 - a. If you feel there is not anyone to contact within the Modern Slavery PEC, please contact Pete Bond (Chief Operating Officer, BIICL), if you do not feel it is appropriate to contact anyone from within BIICL, please contact Andrew Wallis from Unseen UK (a.wallis@unseenuk.org) who will act as an independent facilitator.
- 3) Safeguarding champions or Senior Leadership Team, will update the incident log
- 4) If urgent, alert the Operations Director immediately, if the incident concerns the Operations Director, alert Pete Bond (Chief Operating Officer, BIICL)
- 5) Safeguarding Champions or Senior Leadership Team to follow up if additional steps need to be taken
- 6) Safeguarding Champions to report on the incident log on a quarterly basis to the Senior Leadership Team

Incident log

The safeguarding champions will be responsible for maintaining the safeguarding section within the incident log and shall report this to Senior Leadership Team on a quarterly basis and to Senior Management Board on an annual basis. Should a serious incident arise, this will be brought to the attention of Senior Leadership Team at their next meeting.

Review

This policy will be reviewed following the hiring of the Lived Experience Manager, to ensure the elements on survivor engagement are appropriate. Following this, the policy will be reviewed and updated annually, this review will be led by the safeguarding champions and any updates will be brought to a team meeting to ratify.

Annex 1 – Consent form

Consent to participation in activities where there is an increased risk of harm (e.g. reading potentially sensitive or triggering funding applications or asking an adult at risk to write a blog for us) with the Modern Slavery PEC can be given either in writing or verbally. When consent is given in writing, the participant will read, sign and return this form. When consent is obtained verbally, the member of staff from the Modern Slavery PEC will read through this form and record the answers to the questions below and the participant will be required to sign (virtual signatures will be permissible) as agreement of an accurate record of the conversation. If you are unsure if consent needs to be gained for your activity, contact the Safeguarding Champions to discuss.

The Modern Slavery PEC do not currently engage with participants under the age of 16, should this change, a new consent form will be developed with additional considerations.

Activity details (to be completed ahead of date):

Date/time of activity:	
Location (including online):	
Type of activity, including details on what the participants will be doing:	

Participant details (to be completed by/with the participant):

Name:	
Phone number (optional):	
Email:	

Additional support:

Is there any additional support that the Modern Slavery PEC can provide to facilitate your participation in this activity (e.g. additional reading time due to a learning difficulty)	
If the activity is in person, are there any accessibility requirements that we should be made aware of?	
Is there anything else that you would like to make us aware of ahead of the activity?	

I consent to:

Participation in the above activity

The Modern Slavery PEC keeping a record of my participation via this form

(Additional fields for communications work) Communications:

Please note that a lack of consent for any of the field below will not impact your ability to take part in the activity. You can withdraw consent at any time, including after the activity. If you withdraw consent after publication, we can remove requested materials from the Modern Slavery PEC website, but please note that once information has been shared online, it might be utilised by external sources that the Modern Slavery PEC is not responsible for.

Please ensure that you understand:

- 1) The story will be pitched to X publication [if applicable]
- 2) Once a media piece is published, it can be shared by external sources where the Modern Slavery PEC will not be able to remove it
- 3) You are able to stop the interview/activity at any time
- 4) We are able to publish stories anonymously (please consider this if you do not have legal status in the UK)
- 5) News stories may attract social media comments. We generally advise people to ignore these, but understand this may impact how you feel about taking part

Please tell us if there is anything that you do not want to have included in the interview/blog/story/podcast (such as names, images, questions that you do not want to be asked, details that could put friends or family members at risk):

I agree to (please tick all that apply):

- My quotes being used in [insert communications output]
- My text being used in [insert communications output]
- My name being used in [insert communications output]
- My image being used in [insert communications output]

If you wish to remove your consent to any of the above please email office@modernslaverypec.org and we will update our records.

Print name:

Signature:

Date:

Annex 2 – meeting rules

The Modern Slavery PEC will undertake the following steps to ensure that meetings with people with lived experience are a safe and productive space.

Prior to meetings, the following will be sent to attendees, it will also be repeated by the meeting organiser:

“Please be aware that there may be people in attendance at this meeting who have lived experience of modern slavery. There is no requirement to disclose any experiences during this meeting, but please be mindful that statements might be made which disclose personal narratives of modern slavery”.

We ask that all attendees:

- 1) Are sensitive and respectful, listening to all points of view made in discussion and responding to these and any disclosures respectfully.
- 2) Do not ask any participants for details of their experience of modern slavery. Disclosure is not necessary to participate in any of the Modern Slavery PEC’s work.
- 3) Respect individuals’ wishes in the use of terminology. At the Modern Slavery PEC, we use the terms “people with lived experience” and “survivors.” We try to avoid using “they” as this ‘others’ individuals experiences. Please try to use this terminology in discussions.
- 4) Respect individuals’ right to anonymity. Some attendees might feel more comfortable keeping their camera off and using an anonymous screen name. Please ensure that these individuals are still included as part of conversations.
- 5) Ensure they take breaks and protect their own mental health. Discussions of modern slavery can include upsetting and distressing topics. All attendees at meetings have the right to remove themselves, either temporarily or permanently should they need to.

Annex 3 – sample incident log

Incident number	Incident log completed by	Member of PEC staff reporting incident	Date of incident	Description of incident	People involved (using anonymous if consent is given to being named)	Consent form completed by external participants involved?	Immediate actions taken	Follow up actions taken
1	Name of Safeguarding Champion or SLT member	Name	Date that the incident happened (e.g. the date of the discussion, if the discussion pertained to past events, include this in the description of the incident)	Outline of what happened (e.g. in a discussion regarding a research call, a member of the Lived Experience Advisory Panel left panel meeting due to distress at subject matter being discussed)	Only name individuals if they give consent	Was the consent form completed before this activity y/n. if n then explain why	E.g. meeting paused, everyone given five minute break then meeting resumed without the Expert by Experience panel member	E.g. Safeguarding champion contacted, debrief meeting organised with committee member

Annex 4 – Flow Chart – actions to be taken when an incident occurs

