

# Modern Slavery PEC Safeguarding Policy

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## 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 adults only.

## 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, whilst promoting independence and treating everyone with dignity and respect; and to respond appropriately when harm does occur.<sup>1</sup>

Within the Modern Slavery PEC, we may encounter adults at risk of harm or neglect, including staff which may include 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 and adapt this policy for the course of their work with adults if they do not have an appropriate safeguarding policy. This policy does not cover individuals taking part in activities that the Modern Slavery PEC funds but does not directly organise (for example the activities of funded research projects are not covered by this policy, but the PEC responsibilities are covered in Annexes 4 and 5).

## 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

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

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<sup>2</sup>, whether the individual has been referred into 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. Having experienced modern slavery is not in itself a reason to be considered vulnerable for safeguarding purposes.

## Peer researchers

Peer researchers refers to people with lived experience of modern slavery 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.

## Safeguarding incidents

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. Incidents are not limited to experiences of modern slavery, although this policy recognises that safeguarding incidences at the Modern Slavery PEC are likely to be connected to these.

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 safeguarding incident. 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.

If a disclosure of ongoing modern slavery is made to you during the course of your work this would constitute a safeguarding incident.

An incident may also include but is not limited to a safeguarding concern in relation to: physical, psychological, sexual, financial or emotional abuse or neglect.

A concern can be raised either by a member of staff at the Modern Slavery PEC or by an external individual, made in relation to either themselves, 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 has been or will be established by the Modern Slavery PEC. To raise organisational

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<sup>2</sup> <https://modernslaverypec.org/resources/what-is-modern-slavery>

complaints separate to safeguarding concerns, see the BIICL Safeguarding Policy (if you are unable to access this policy, please email [office@modernslaverypec.org](mailto:office@modernslaverypec.org) and we will send you a copy).

## Empowerment

Empowerment covers both the inclusion and 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 and their expertise 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 and the forthcoming survivor engagement strategy.

With regards to empowering activities that will support this work that also have safeguarding considerations, we commit to:

- Ensuring that informed consent<sup>3</sup> is appropriately sought and given for any work that the Modern Slavery PEC is undertaking where we decide there is a 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 views and expertise 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 Lived Experience Panel Members, peer researchers, testing funding call scopes, acting as panel members, acting as experts offering advice on funding or on outputs
- Recognising the right to remove oneself, where reasonably practical, from contributions (temporarily or permanently), without any disclosure required, and 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 requiring disclosure, revealing identities, or 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, participants should be given prior notice.

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<sup>3</sup> <https://researchsupport.admin.ox.ac.uk/governance/ethics/resources/consent>

## 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.

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 (see "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 at risk (see referral process and Annex 3 for a Flow Chart of contacts). They are the appropriate first points of contact should an incident arise and shall also be responsible for maintaining the incident log (see Annex 2). 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.

The current safeguarding champions are Victoria Tecca ([v.tecca@modernslaverypec.org](mailto:v.tecca@modernslaverypec.org)), Oly Glasson, Monday, Thursday, Friday only ([o.glasson@modernslaverypec.org](mailto:o.glasson@modernslaverypec.org)) and Izzy Templer, Tuesday, Wednesday only ([i.templer@modernslaverypec.org](mailto:i.templer@modernslaverypec.org)).

## 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. We recognise that we are accountable for both the actions we take and the actions we do not take.

## Meeting rules

All staff and external attendees will adhere to the Modern Slavery PEC meeting rules. This will apply to all online and in-person public events and public meetings being hosted by the Modern Slavery PEC. Where meetings are being hosted by an external, the Modern Slavery PEC team will send these meeting rules to external hosts ahead of meetings and advise upon their use.

Meeting rules will be posted in, and pinned to, the meeting chat for online meetings. For in person meetings, the meeting rules shall be printed on any hard copy agenda and discussed at the start of the meeting.

## 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.

We will support and represent those with lived experience of modern slavery. This includes involving survivors 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/or 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 and visibility 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

## Proportionality

All safeguarding actions will be proportionate to the level of risk and responsive to the needs and feedback of the individual concerned.

## Protection

### Incident response

There may be safeguarding incidents (defined above) where an adult 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.

In responding to a safeguarding incident, ensure that the safety of yourself and the adult at risk of harm or neglect is first priority.

Key principles for responding to an incident:

- Remain calm and offer reassurance following a disclosure of harm or neglect that they have done the right thing in telling you
- Listen attentively and assure them that you are taking any disclosure of harm or neglect seriously
- Try to avoid interrupting the individual, passing judgement, making any conclusions or asking leading questions, let them explain the incident in their own words
- You can take notes to help detail the situation, but only do so after explaining the consent and confidentiality sections below
- Clearly state why you think a safeguarding incident has been raised and that you have a duty to protect them, that you may have to pass on the information they have shared but that they will be involved in decisions that affect them
- Explain the Modern Slavery PEC's safeguarding responsibilities and 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, your line manager or member(s) 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](http://www.healthassuredeap.com) or on 08000305182.

## Consent and confidentiality

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 are contacted by an organisation or service who says you have a legal duty to break confidentiality, you should ask for the information to specify the nature of their lawful



authority. The Modern Slavery PEC might seek legal advice before making any disclosure

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
- National 24Hour Freephone Domestic Abuse Helpline: 0808 2000 247
- Men's Advice Line: 0808 801 0327
- National LGBT+ Domestic Abuse Helpline: 0800 999 5428
- Respond (victims and perpetrators of sexual abuse who have learning disabilities): 0808 808 0700
- Stop Hate Crime: 0800 138 1625
- Victim Support: 0808 168 9111

Ann Craft Trust (ACT)

A national organisation providing information and advice about adult safeguarding. ACT have a specialist Safeguarding Adults in Sport and Activity team to support the sector  
Tel: 0115 951 5400



Email: [Ann-Craft-Trust@nottingham.ac.uk](mailto:Ann-Craft-Trust@nottingham.ac.uk)  
[www.anncrafttrust.org](http://www.anncrafttrust.org)

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 (Annex 3).

## Partnership

We will work in partnership with other stakeholders 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 have established 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 meaningful 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 2)
- 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 or that your report of a safeguarding concern is not being dealt with properly please contact the BIICL Director, Spyros Maniatis ([s.maniatis@BIICL.ORG](mailto:s.maniatis@BIICL.ORG)), 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](mailto:a.wallis@unseenuk.org)) who will act as an independent facilitator.
- 3) Safeguarding champions or Senior Leadership Team, will update the incident log (which is password protected and not accessible to the wider team)
- 4) If urgent, alert the Operations Director immediately, if the incident concerns the Operations Director, alert Spyros Maniatis (Director, 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.

The Modern Slavery PEC might also include our responses to occurrences, that do not constitute a formal incident as defined above. These will be fully anonymised and will only be recorded to improve the Modern Slavery PEC's processes.

## Review

This policy will be reviewed and updated bi-annually, this review will be led by the safeguarding champions and any updates will be brought to a team meeting to ratify. The Modern Slavery PEC will develop a distress protocol to offer practical guidance for staff members.

## 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 18, 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 used 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, without this impacting the agreed payment for the activity, or for any future work with the Modern Slavery PEC
- 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](mailto:office@modernslaverypec.org) and we will update our records.

Print name:

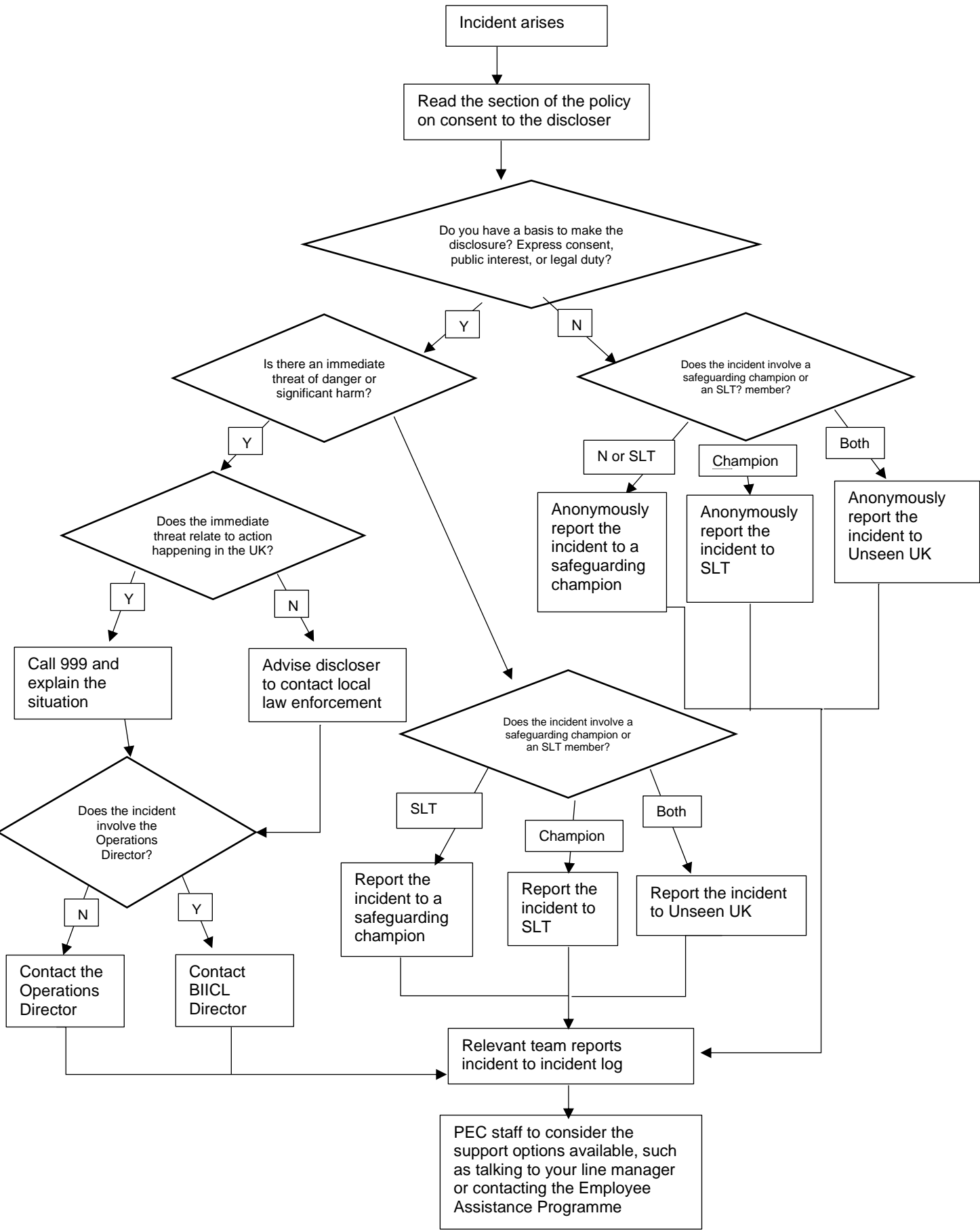
Signature:

Date:

## Annex 2 – sample incident log

Incident number	Incident log completed by	Member of PEC staff reporting incident	Date and time 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	Signature of person reporting incident
1	Name of Safeguarding Champion or SLT member	Name	Date and time 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. what meeting were you in, what was said etc.)	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 3 – Flow Chart – actions to be taken when an incident occurs



## Annex 4 – Pre-Award considerations

By virtue of funding research, the Modern Slavery PEC's safeguarding considerations extend beyond the staffing team based at the Modern Slavery PEC, to those that take actions based on our funding calls. This annex sets out the risks and mitigations that are already in place across the funding application and decision-making process.

### Funding calls

Within our funding calls, two sections reference safeguarding concerns:

#### *"Ethics and Safeguarding"*

There may be a need to collect primary data, e.g. via survey, semi-structured interviews or focus groups, from key people and organisations that work in this sector, in which case the applicant should detail their proposed plans and processes for gaining ethical approval before data collection begins. See the section below on working with people with lived experience where we outline our safeguarding and collaboration expectations.

The Modern Slavery PEC strongly encourages that, where appropriate, applications involve people with lived experience of modern slavery in the design and/or implementation of the project. Where a project undertakes new research directly involving vulnerable groups or people with lived experience modern slavery, projects should carefully consider ethics and safeguarding implications. In both the ethics and the safeguarding statements, applicants should include reference to organisational policies and processes around safeguarding, developing project specific policies where appropriate."

"As per our guiding principles, the Modern Slavery PEC encourages researchers to include people with lived experience in the appropriate aspects of their research project. We insist all projects that work with adults at risk, including those with lived experience of modern slavery, provide either an appropriate institutional policy or a specific safeguarding policy to govern their work in advance of work starting, with this being sent to the Modern Slavery PEC for our records. The research team should highlight specific risks and mitigations in their safeguarding statement and identify a project safeguarding officer or champion. According to organisations such as UK Collaborative on International Development Research (UKCDR), safeguarding means 'taking all reasonable means to prevent harm from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur'. Policies should include consideration of rights of people with lived experience and whistle-blowers, and how the project addresses questions of equity, fairness, transparency and accountability. This should include all parts of the research chain, from research funders, planners and practitioners to participants and local community members, where everyone has the right to be safe from harm.

We request that the following principles are adhered to when working with people with lived experience:

- Ground rules are established with the participants, including use of terminology, and agreed rules about withdrawal from discussions or activities.
- Participants are signposted to resources to support them (the Modern Slavery PEC can assist with these) and consider funds to support this if appropriate.
- People with lived experience are paid for their time (including being participants on interview panels and focus groups) and that this is done so in a manner appropriate to participants (considering cash payments or use of vouchers). We expect a minimum hourly rate of £10.90 (outside of London) or £11.95 (within London) for participants, based on the Living Wage Foundation's current rates, but we would encourage applicants to explore best practice in the sector and support higher rates of pay where justified in the justification of resources.
- A risk assessment is carried out, specifically considering risks for those with lived experience. These risks and mitigations should be included in your Safeguarding Statement."



This approach was taken in recognition that it might not be appropriate in all circumstances to insist that individuals with lived experience take part in all research project. For example, if an applicant feels that the nature of the research will be too sensitive, so as to retraumatise potential participants, or if individuals with lived experience of a topic being explored were physically unable to participate in research activities.

### **Application forms**

All applications to the Modern Slavery PEC for research funding should include a question on safeguarding. These will ask for a description of the approach and process for ensuring any people at risk who are involved with the research are appropriately safeguarded, including highlighting any particular risks for the project and going beyond standard University safeguarding procedures where appropriate. For funding calls where the Modern Slavery PEC identifies a heightened risk associated with the project's methodology, for example working with children and young people, additional questions should be included to ensure the researchers have the knowledge, skills and expertise to understand the work safely.

## Annex 5 Post award safeguarding considerations

### **Policies and Procedures**

As set out in Annex 4, it is a requirement that successful applicants share either an appropriate institutional safeguarding policy or a project safeguarding policy to govern their work as a condition of funding. This should include named Safeguarding Champions for the research project and distress protocols, where appropriate. This should also take into account specific risks relating to the project activities, for example, if children (under 18) are to be engaged with.

The Modern Slavery PEC's Safeguarding Champions will read, sign and appropriately store this information. Where a safeguarding policy is not deemed to be appropriate, the Modern Slavery PEC will work with the research team to develop their policy and protocols. Research activities working with people at risk should not be started until the Modern Slavery PEC signs off the safeguarding policy.

The Modern Slavery PEC's Safeguarding Champions will offer to act as independent safeguarding facilitators for each research project should safeguarding incidents arise (see below).

### **Safeguarding incidents**

If a safeguarding incident is raised within a project, the research team should share anonymised records of these with the Modern Slavery PEC at the end of the project to share learning and promote best practice. The Modern Slavery PEC can also assist projects when safeguarding incidents arise. Projects should email the Modern Slavery PEC Safeguarding Champions for assistance.

Any safeguarding concern shared with a Modern Slavery PEC independent safeguarding facilitator should be responded to as a potential safeguarding incident and responded to as set out above in [Safeguarding Incidents](#) and recorded in the Modern Slavery PEC's incident log as set out in [Referral processes](#).