modern slavery SME TOOLKIT

Helping UK SMEs Mitigate Risk of Modern Slavery

Evaluation Report December 2021

SHIVA
FOUNDATION

STOP THE TRAFFIK
PEOPLE SHOULDN'T BE BOUGHT & SOLD

Executive Summary

Recognising the lack of targeted anti-slavery resources specifically for SMEs who make up the majority of business in the UK, Shiva Foundation and STOP THE TRAFFIK created a toolkit to support this market.

The free toolkit, which was created and rolled out between March 2020 and October 2021, includes a practical risk assessment tool, advice on how to mitigate risks for direct employees and agency workers, relevant reporting mechanisms, supply chain risk management advice and a wealth of additional free resources.

This evaluation report details the key takeaways and insights from the creation, promotion and reception of the toolkit.

Key successes:

- The toolkit has been downloaded over 2600 times
- 200 people have attended webinars
- A network of over 20,000 SMEs have been reached through 75 directly linked stakeholders
- 7 organisations have embedded the toolkit in their own business offerings
- The toolkit was deemed fit for purpose by webinar attendees

Learnings:

- The toolkit was useful for public sector organisations as well
- Accessibility of the toolkit was important and, as a result, shorter versions were made to accommodate this
- Despite trying to initially focus on business advisory services, there was an appetite from SMEs themselves, so the webinars shifted to build their capacity directly
- It is difficult to get direct feedback from the SMEs who have engaged because of the nature of the webinars (being online and slightly more one-way than a workshop)
- COVID-19 set the timeline off, however both organisations stayed committed and the programme has remained a priority despite the challenges and staff turnover.

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Introduction

Small and medium sized enterprises (SMEs) are a crucial part of the UK's economy, employing over 60% of those working in the private sector. All SMEs are vulnerable to modern slavery occurring in their operations whether they are aware of it, or not.

Realising that SMEs are often excluded from capacity-building on modern slavery risks, Shiva Foundation began a partnership with STOP THE TRAFFIK from the shared recognition that not enough was done to support SMEs to address the risks of modern slavery.

After conducting a survey with SMEs themselves, Shiva Foundation and STOP THE TRAFFIK learned that the primary barriers for addressing modern slavery risk within SMEs are lack of knowledge and lack of legal requirement. This toolkit aims to raise knowledge levels and address how, regardless of the legal requirement, addressing modern slavery risk supports their business efforts.

STOP THE TRAFFIK (STT) and Shiva Foundation (SF) have compiled a free toolkit to help SMEs take appropriate precautions to prevent modern slavery from occurring in their businesses. This toolkit includes a practical risk assessment tool, advice on how to mitigate risks for direct employees and agency workers, relevant reporting mechanisms, supply chain risk management advice and a wealth of additional free resources. The information below details the key-takeaways and insights from the creation, promotion and reception of the toolkit.

Key definitions

SME:

In the UK, sections 382 and 465 of the Companies Act 2006 define an SME for the purpose of accounting requirements. According to this a small company is one that has a turnover of not more than £6.5 million, a balance sheet total of not more than £3.26 million and not more than 50 employees (UCL).

Modern Slavery:

Modern slavery is an umbrella term that was adopted by the UK Government in 2015 to coordinate the prevention and prosecution of four crimes: slavery, human trafficking, forced labour, and domestic servitude. All incidents of modern slavery include two basic elements (1) the deception or coercion of an individual (2) for the purpose of exploitation.

Social media was used as a tool to promote the webinars for any interested businesses.

Evaluation approach

The focus of this report is a Process Evaluation, which assesses how a programme is being implemented. This looks at operations and covers the efficiency of its activities, tracking them against the programme's plan, resources, and how stakeholders interact.

To do so, data capture during the monitoring phase focused on how the toolkit was elaborated, key decisions that shaped the programme (such as creating a summary of the toolkit), and finally, outreach efforts to promote the toolkit to target beneficiaries. The following monitoring and evaluation tools were used:

– **Observational evaluation:** Attending training events and observing the interaction between different stakeholders and focusing on the level of interest and knowledge of target beneficiaries.

– **Key Informant Interviews:** Capturing the implementation process through the perspective of programme managers.

– **Data analysis:** Looking at attendee lists and responses to post-training surveys.

Programme background

The core of the work done on supporting businesses in their efforts against and awareness of modern slavery tends to target those who fall under the legal requirements of the Modern Slavery Act 2015. Both organisations found that most of the resources available out there were therefore tailored to bigger businesses with turnover rates of at least 36 million GBP per year, not to small businesses. Both organisations were involved in the content, as the original programme managers both had expertise in workers' rights and/or supporting businesses with human rights. SF was responsible for the design element of the toolkit's creation. They both worked on outreach with their specific networks.

The original approach of the programme was to reach out to Hubs and other organisations that had a network of SMEs, to train them on the toolkit which they could then share with their network. However, this changed after the launch as webinars that followed also directly targeted SMEs.

Programme timeline

The programme is divided into two phases that overlapped. The creation of the SME Toolkit, both elaborating the content and its design, was the first phase. The second phase was communication and outreach efforts to promote the SME Toolkit to the widest audience possible.

Phase 1:
Creation of the SME Toolkit

By March 2020
— STOP THE TRAFFIK and Shiva Foundation partner on the toolkit
— Content creation for the SME Toolkit
— COVID-19 lockdown begins and interrupts the programme

July 2020
— Programme managers work remotely and finalise the content of the SME toolkit

August to December 2020
— Design of the SME Toolkit
— Staff turnover in both organisations
— Planning the launch of the Toolkit, communications and outreach
— Content peer-reviewed by experts

February 2021
— Launch of the SME Toolkit

March 2021
— Creation of a summary document highlighting key points from the SME Toolkit

Phase 2:
Communication and Outreach

February 2021
— Presentation at Hertforshire's IBAG meeting (17 attendees)
— Webinar (34 attendees)
— Presentation at Hertfordshire Growth Hub meeting (12 attendees)

By the end of April 2021
— Event organised with NNCF to share the toolkit with their network. (19 attendees)
— Webinar (29 attendees)
— Outreach to the PCC network.

May and June 2021
— Two webinars delivered (39 attendees)
— Workshop at the West Yorkshire HMSP (23 attendees)

July 2021
— Workshop with Hertfordshire's PCC IBAG (8 attendees)

Sept 2021
— Webinar delivered (11 attendees)
— IASC interested in including the Toolkit in an event

Challenges

Turnover: After the initial conception of the programme, and before its implementation, the two programme managers left their respective organisations. This slowed the process and required a time for new team members to take ownership of the programme to implement it successfully.

The Impact of Covid-19: COVID-19 and lockdown measures caused delay from both organisations. Both STT and SF took some time away from the programme's implementation to consolidate and adapt to their respective internal changes. Both organisations also agreed that these unprecedented times severely impacted SMEs and therefore outreach of the toolkit should be delayed.

Engagement with SMEs: Despite the number of downloads and interest, it has been difficult to get feedback from attendees. Part of it is because of the remote nature of the engagement.

Adaptability:

– From feedback the organisations received, they were able to create the summary version of the SME Toolkit which was seen to be more accessible for businesses. Further through the process, a brochure document was suggested to aid with promotions for partners in the relevant networks.

– Despite the aforementioned challenges, both organisations kept this programme at the top of their priority list and not much time was lost.
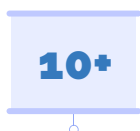
Successes

– **Businesses have shown more interest** than anticipated which was why additional webinars were organised. When SF compares this engagement to other business programmes they have delivered, this is a clear success.

– Long-term Impact: Organisations with large **SME networks have included the SME Toolkit as part of their resources:**
  – Other organisations have imbedded elements of the resource in their training package.
  – GLAA reached out to include this in their training.
  – The FSB has included it within the support they offer to SMEs.
  – The Hertfordshire Growth Hub has added it as a "business listing" in their online marketplace.

– The **webinars** were also shifted from a physical to an online event, which consequently **allowed for more people to attend**.

– Businesses are **using the tools**
  – Some have used it for staff awareness raising
  – Many had implemented business practice changes (or were about to) because of the toolkit

– The webinars ended up being more open to businesses that were interested, instead of targeting business advisory networks specifically. This has attracted people from various sectors (e.g. food industry, care sector, healthcare, technology). This was a success.

Fit for purpose...

– Qualitative feedback: Attendees thought this tool was **fit for purpose**.

– **Direct outreach to 100+ stakeholders** but through network partners (Federation of Small Businesses and Hertfordshire's Growth Hub) the outreach has a combined reach of **20,000 SMEs** and the toolkit was shared on multiple occasions.

Share!

– **Business network sharing the toolkit:**
  – Hertfordshire growth Hub
  – Federation of Small Businesses
  – Two local Independent Business Advisory Groups
  – The Chamber of Commerce
  – GLAA

"Organisations with large SME networks have included the SME Toolkit as part of their resources"

10+

– **Ten presentations/webinars/trainings** were delivered between February and September 2021. Across these events, **200 people** attended.

Learnings

– By using a common "contacts" document the organisations were able to divide and conquer outreach efforts and ensure duplication was avoided.

– The first events, including the launch webinar, were for people in organisations that had contacts with SMEs. So, they could spread the word. However, the next four webinars were more specifically focused on SMEs as a result of requests.

– It was clear that local authorities and public sector organisations who attended the webinars saw that this toolkit was very adaptable to their needs as well.

– It was important to make the toolkit as accessible as possible, to ensure it could be easily used as a standard to share.

– Observational analysis took place during two of the webinars but found that not much interaction existed between participants and presenters to observe. The nature of the webinars was a presentation via zoom where participants more often than not, kept their videos and microphones off. There were a few questions asked at the end of the webinars, however not much discussion. Going forward, it would be important to adapt the webinar to a workshop and to hold it in person, as far as that's possible, if engagement with participants is a key goal.

Next Steps

– **Further promotion:** There are preliminary plans to share this toolkit through more nationally focused events aimed at SMEs and encouraging engagement.

– **Making it sustainable:** The creation of videos of the webinars to ensure more easily accessible online tools that can be sustained without active implementation.

– **Making it sector specific:** There are discussions about creating or adapting industry-specific SME toolkits taking nuances for each industry into consideration.

For further information:

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