The Co-op’s Bright Future programme: An independent Interim Review

October 2017, University of Liverpool
What is Bright Future?

Bright Future is a pathway to permanent employment for survivors of modern slavery. It is an initiative created by the Co-op to offer paid work placements leading to a non-competitive job interview. It is open to survivors of modern slavery who are identified as suitable by charity partners who work on the programme with the Co-op, and who continue to offer regular support to those on placements. Bright Future was launched in March 2017 and the Co-op has aims to provide placements for 30 survivors within the first year.

At the point which this report was completed (end of October 2017), the Bright Future programme included a number of collaborating charity partners including City Hearts, Hope for Justice, the Medaille Trust, the Snowdrop Project and the Sophie Hayes Foundation.

“This is very important to me. The topic of Modern Slavery resonates with us and the Co-op’s ethics. We want to make a difference ourselves, and get other people to make a difference. If we could influence other businesses that would be great.”

Steve Murrells, CEO, Co-op Group

“I would like to thank the Co-op for all their help, this is a new chance and a new life. I am now able to settle in the UK, I have a partner and we are looking forward to our future. I am very happy to have been given this chance.”

Candidate
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1 Dr Alex Balch is Co-Director of the Centre for the International Study of Slavery at the University of Liverpool; Professor Gary Craig is Emeritus Professor of Social Justice at the Wilberforce Institute for the study of Slavery and Emancipation, University of Hull; Ms Kate Roberts is Head of Office at the Human Trafficking Foundation; Ms Alex Woods is a PhD candidate at the University of Liverpool.
1 Introduction
1. Introduction

The government has identified modern slavery as one of its top policy priorities. However, a number of studies have demonstrated serious gaps and weaknesses in the current system of support for survivors of modern slavery. There have been warnings that individuals are being left in precarious situations following the end of the 45-day statutory period of support currently made available through the National Referral Mechanism (NRM). These risks include homelessness, destitution and re-trafficking.

The Independent Anti-Slavery Commissioner has highlighted the issue of long-term support for survivors. An inquiry into this issue held by the House of Commons Work and Pensions Committee also proposed changes in the way that the UK supports survivors. On 26 October 2017 the Government responded with a range of measures aiming to enhance standards and increase the time over which support is made available. However, in spite of these reforms, there is no commitment to monitor long-term outcomes for survivors, the ‘cliff-edge’ where support ends is simply delayed, and there remain a range of significant obstacles for individuals in rebuilding their lives, including hurdles around stability of accommodation, rights of residency, access to benefits and the right to work.

It is in this crucial gap in support for victims that the Co-op has decided to intervene through the creation of an employment model. Working alongside a number of charities that continue to offer support for individuals after the government-funded system has ended, the business has developed its Bright Future programme. This programme, according to the Co-op, has been designed to help victims of modern slavery to become survivors by providing them with paid work placements and, where appropriate, permanent employment. Bright Future aims to provide a pathway to paid employment and ‘a route to wider integration into society for victims of modern slavery’.

When Bright Future was launched in March 2017, the Co-op committed itself to a target of helping within the first year of the programme at least 30 people who had experienced conditions of slavery by providing the opportunity of a paid work placement and, if they are ready, a guaranteed job. In addition, the Co-op stated its desire to establish a replicable model based on an efficient process which delivers the best possible outcomes for survivors. To date the programme has completed placements of 12 survivors with a further 18 either running or under discussion in both Co-op Food stores and a Distribution Centre.

It should be noted that the Bright Future programme is not a model of support that is suitable for all survivors. Many do not meet the criteria set by the Co-op and many never will. The wider debate around a comprehensive system of ongoing support for all survivors of modern slavery continues but is beyond the scope of this Review.

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3 The National Referral Mechanism (NRM) is a framework for identifying victims of human trafficking or modern slavery and ensuring they receive the appropriate support (http://www.nationalcrimeagency.gov.uk/about-us/what-we-do/specialist-capabilities/uk-human-trafficking-centre/national-referral-mechanism).
7 To be considered for Bright Future, candidates must have a right to work, a reasonable level of English language and emotional stability (see Annex 3).
1.1 About this report

This report is an independent interim review of the Bright Future programme, commissioned by the Co-op, and conducted by a team of researchers led by Dr Alex Balch from the University of Liverpool. The research that informs it was conducted during September and October 2017. We were asked to assess the relevance, efficiency and effectiveness of the Bright Future programme, and to consider its outcomes and sustainability (see Annex 1).

We carried out 35 interviews with key informants (see Annex 2) as part of our evaluation of Bright Future, its processes, the experiences of those participating in the programme, the operation of relationships between the Co-op and its external partners and how these could be improved. This report therefore has a focus on lesson-learning with a view to how the programme can be improved and enhanced, but also how it can inform national efforts to address the problem of long-term integration of survivors of modern slavery.

It should be noted that our findings and recommendations are based on the relatively short lifespan of the programme and we were not able to interview all of those who had been on individual placements, and can therefore only point to very preliminary ideas about outcomes. It is also important to recognise that many survivors will not have the right to work (see Annex 3), and others may never recover sufficiently to be in a position to work. Therefore the Bright Future programme alone should not be considered the sole basis for a national model for wider survivor care in the UK.
1.2 The rationale for Bright Future

What are the potential benefits of the Bright Future programme?
What are the benefits for those taking up the work placements?
What are the interests for the Co-op in getting involved in this area? What are the benefits for other groups - partner organisations, other staff, Co-op members, etc?

In explaining the rationale driving Bright Future, Co-op CEO Steve Murrells told us, “Most people would conclude that Bright Future is a good thing to do. But it is more deep rooted. The Co-op will only become a movement again if we pick causes that are really important - that we can make a difference with.”

We found a feeling among many we interviewed, particularly those involved with the placements on the ‘shop floor’, that this programme is about doing the ‘right thing’. But that it is also a means of investing in good quality colleagues, who would value the Co-op for its investment in them, and who would work well and remain in job - in a sector and line of work where there is often a problem of high staff turnover.

As far as we are aware, no large-scale business in the UK has implemented anything similar to Bright Future. We have identified a selection of other schemes – some of them very small - which aim to place survivors of modern slavery or other vulnerable groups into work, but none which has been sponsored by a large-scale business involve paid placements or guarantee an opportunity for a job. A brief description of some of these schemes is provided in Annex 4, and where relevant these are referred to. However we did not conduct a systematic evaluation of other schemes or attempt a direct comparison with the Bright Future programme.

Benefits of Bright Future

“Retail is an area with large staff turnover as it is difficult work. Bright Future provides opportunity to attract and nurture colleagues who will view the Co-op positively and will have loyalty to the business. It is about harnessing that emotional intelligence, building mutually beneficial relationship that inspires loyalty on both sides.”

Co-op employee

“It is the right thing to do. Why wouldn’t we do it?”

Co-op employee

“It has been really humbling to know that you have helped someone improve their quality of life.”

Co-op employee
1.3 Structure of the report

In Section 2 we consider the genesis and development of Bright Future: the process as it currently exists, and discussion of the appropriate criteria for establishing ‘success’. Section 3 explores the main risks and their mitigation, Section 4 summarises our main findings and recommendations.
“I was looking for work, I have the right to work. I’ve applied for jobs but never had an interview so when [supporting charity] told me that the Co-op is looking for a worker I was interested. I was told this is a big company, I would be paid correct wages and it would be a decent job - the people controlling me would also be controlled so they would behave well. When they told me I didn’t think two times. I wanted to start.”

“I would like to get a job and progress in the Co-op. Maybe one day... I could have my own business. This is a big long dream for the future. Sometimes you have to work hard and I am. When I came here I knew nothing at all. I keep going. For me to work is a big possibility. Working in a big company with many different people gives me a possibilities to learn.”

“Sometimes I don’t even ask, they come and help. I can speak to any colleague. I don’t need to go to the manager. All my colleagues can help me. I want to learn as much as I can.”

“...on the first day you don’t even know how to open the door - but after 2-3 days you know how to do it. This is the best.”

When someone says thank you and they mean it because you have helped them. They give you a smile. For people working there I am the new one but they have helped me to progress.”

J feels that the Bright Future programme has given him new opportunities that were not open to him before. “I have never worked in a place like this before, so I have learned a lot of new skills”, he says. “I am confident that if, in the future, I wanted to look for a new job I would be able to because I have received really good training and am now a skilled worker”.

During the time working at the Co-op, J has found managers and colleagues to be helpful and friendly, which has made working there a positive experience. “All of the managers and colleagues were really helpful; I could always ask if I had any questions.”

J also found that having contact with [supporting charity] made the process easier, particularly at the beginning of his placement. “[Supporting charity] were there if I had any problems in starting work which was very helpful.

“Of course I would recommend working in the Co-op to others. Even if you have never worked anywhere like it, or even if you have limited English, but are willing to work hard, then yes, I would recommend it to everybody.”

“...I had some difficulties with English at the beginning, but they helped me to find support for improving my English”.”
2 Development of Bright Future
2.1 A brief history

The formal launch of Bright Future in March 2017 emerged in parallel with the release of the Co-op’s first Modern Slavery Statement. Bright Future evolved from a previous initiative started by David Camp of Stronger Together working in partnership with City Hearts, a charity that houses and helps men and women who are survivor of human trafficking. During late 2016 and early 2017 the Co-op’s Policy and Campaigns team led efforts to renew and enlarge this initiative, and to create a formal framework for work placements for survivors of modern slavery. Following discussions with Co-op HR colleagues around the ways in which this could be achieved, the Co-op decided to use and modify their existing work experience model rather than creating a whole new process.

While we found that the response from all stakeholders we spoke to was overwhelmingly positive, there was some difference of opinion about the ease with which the new colleagues on placements could successfully go on to fill a permanent role in a Co-op workplace. We also detected some confusion among Co-op staff about the status of Bright Future, in particular the extent to which a placement counted as training or ‘regular work’. Section 2.2 describes the key elements of Bright Future and introduces some of the questions and issues that were raised by interviewees in the course of our research.

8 co-op-modern-slavery-statement-2016.pdf.
9 Stronger Together is a multi-stakeholder initiative, of which the Co-op is a member, that aims to reduce modern slavery (http://strongertogether.org).
2.2 Bright Future: Key elements and recommendations for improvement

This section provides a summary of the key elements and processes underpinning the Bright Future programme. It also summarises our findings and recommendations for improvement.

1. Initial contact between the charity and the Co-op about Bright Future
2. Identification of candidate by the charity
3. Charity identifies a survivor who is ready for Bright Future
4. Pre-placement meeting between prospective manager, survivor and support worker
5. Completion of documentation (see managers’ pack) with responsibilities of each party fully outlined
6. Start of placement
7. Ongoing support during placement
8. Non-competitive job interview. If successful, probation period begins
### Table 1. Summary of the key elements of the Bright Future programme, with findings and recommendations.

<table>
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<tr>
<th>Elements of Bright Future</th>
<th>Description</th>
<th>Our findings</th>
<th>Our recommendation</th>
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<tbody>
<tr>
<td><strong>1. Initial contact between the charity and the Co-op</strong></td>
<td>The first step for the Bright Future programme is about creating a relationship between the Co-op and charities that work with survivors of modern slavery and can put forward candidates for placements. Initial meetings allow Co-op staff to introduce the aims and objectives of Bright Future, and explain different responsibilities and expectations. As part of this they may include a visit to one of the stores.</td>
<td>There was some difference in understanding as to what the programme entailed, the level of support needed by and available from both sides, and the expectations of the survivor once in the placement.</td>
<td>This report may prove to be a useful source of material for prospective charity partners in terms of explaining Bright Future. A short, summary version could be created specifically for this purpose.</td>
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<td><strong>2. Identification of candidate by the charity</strong></td>
<td>A number of ‘filtering’ documents have been created to help charities identify those victims who could participate in Bright Future. This is done alongside the professional assessment of the charities regarding the suitability of the candidate. Part of this assessment is about the establishment of the right to work in the UK, and suitability of the candidate for the type of work they will be undertaking. The Co-op asks all charities to use the same ‘Ready for Work Filter’ drafted by City Hearts. This document is a checklist containing 15 criteria.</td>
<td>The creation of a common ‘filter’ has its benefits, but some of our interviewees reflected that it did not fit all cases. It was also observed that the process of selection and preparation for work could not be rushed, as there are risks associated with putting forward a candidate who was not suitable. There was a lot of enthusiasm on the part of the Co-op to increase numbers on the programme which could influence this decision-making. This emphasises the importance of maintaining separation between the roles, and giving the supporting charity as much autonomy as possible in this part of the process.</td>
<td>It would be helpful if a dedicated role is created within the Co-op to liaise with charities on individual placements. This could be a way of developing, in a more collaborative way, detailed and appropriate guidance for use by charities to identify candidates.</td>
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<td><strong>3. Submission of candidate to the Co-op</strong></td>
<td>Once an individual has been identified as potentially suitable, the charity partner submits their details and area postcode to the Group Policy and Campaigns team to identify a potential placement location.</td>
<td>The current system is based on an ad-hoc searching of suitable stores, and a time-consuming store-by-store matching process. If the ambition is to maintain and expand the Bright Future programme then this process will need to be more systematic, with a common database to match candidates rather than a manual search.</td>
<td>If Bright Future is to be sustainable and scalable then a system needs to be developed that will enable the logging of placement vacancies centrally. Ideally this should be connected to a staff member responsible for matching these with charities and survivors they can identify that are interested in placements.</td>
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<td><strong>4. Pre-placement meeting</strong></td>
<td>The prospective Co-op manager, candidate and support worker from the charity partner have a preliminary meeting. This provides all parties with an opportunity to consider the suitability of the placement. A tour of the workplace is included and a number of documents are emailed over to the manager before the pre-placement meeting. At this meeting the ‘Work Placement Agreement Form’ is completed.</td>
<td>This process is explained in a number of training materials which are available for managers, including a guide and description of the placement process. These materials define roles for each of the key actors involved in any individual placement, together with the framework and individual elements of the programme, such as length, hours of work, pay, and right to work checks etc. They outline what needs to be done before, during and after any work placement (with supporting documents available on the Co-op Intranet).</td>
<td>There is an opportunity at this point for a more thorough needs analysis to be conducted and agreed upon with an enhanced version of the Work Placement Agreement (see recommendations in step 7). This could, for example, include an explicit agreement on the support that will be provided by the charity partner, and an action plan for the Co-op manager to use in order to meet the workplace needs of the candidate. This could include the candidate’s particular personal health needs or upcoming appointments (eg connected to criminal proceedings).</td>
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<tr>
<td><strong>5. Completion of all necessary documentation to start work</strong></td>
<td>Alongside the Work Placement Agreement Form, other documentation is completed by the Co-op manager (eg HMRC Starter Checklist).</td>
<td>Some interviewees at the Co-op were surprised to find that charities are not always aware of all the requirements or documents needed to start work. This could be explained earlier in the process, eg through a pre-placement factsheet for charities.</td>
<td>Production of ‘starter packs’, for both the supporting charity and the candidate, detailing the pre-placement requirements and expectations would be helpful (eg including advice or help on how to open a bank account or secure an NI number if necessary). The Co-op should consider if as a business there are other practical ways it can help candidates or the charity partners.</td>
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### 6. Start of placement

The ‘Day One Induction checklist’ is then completed by the Co-op manager. The manager identifies a colleague to be a suitable ‘buddy.’ The role of the buddy is to provide additional support and help to the candidate when needed, explaining how to do tasks and being around to answer any questions. The manager is asked to find a buddy who is available while the person is on the placement, and to make sure they know who this is when they start.

**Our findings**

Some of the survivors who had placements told us that they needed extra help at the very beginning of their placements, for example because of the gap in income created by the benefits system, or incurring other expenses such as uniform or other help that may not be provided by Co-op.

While the buddy system is a welcome help in this regard, there were examples where it proved difficult to match up working patterns. There were also questions around the issue of disclosure, with the buddy not expected to know about the situation of the candidate (see Section 3 on risks).

Considering how precarious the situation is for some of these candidates (even if they have stable accommodation and status, and particularly if they have children), the extra pressure of starting a work placement will inevitably add to financial stresses (travel, food etc) that could be averted relatively easily by the Co-op with some additional support.

**Our recommendation**

The Co-op should consider a more comprehensive package for survivors, that would be optional and include an advance on wages to cover any gap in income and/or vouchers for costs such as uniform and travel which need to be paid up front.

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### 7. Ongoing support during placement

There is regular and planned communication between the charity and the candidate about the placement. This is normally a minimum of a weekly phone call, but may also include face-to-face meetings and/or visits.

**Our findings**

There was some confusion among charities with respect to the level of support they are expected to provide during placements. It could be made clearer what the expectations are, including the level and kind of contact that should be available.

**Our recommendation**

The Starter Packs could include clearer details as to division of responsibilities between, and expectations of, all parties. This could be built into, or alongside, the Work Placement Agreement Form and could be closer to the format of a Memorandum of Understanding (MoU) between the Co-op and the supporting charity.

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### 8. Non-competitive job interview

At the end of the 4-week paid placement, candidates are offered a non-competitive job interview. If they are successful, they get a job. At this point the successful candidate enters a 13 week probationary period that all new-starters have to complete. However the 4 weeks already worked counts towards this probationary period, which is in effect reduced to 9 weeks.

**Our findings**

There were some occasions where more flexibility was required with respect to the length of time before the job interview took place (e.g. if the candidate needed extra time on the job to be fully ready for the interview). There were also comments made about the appropriateness of a formal interview when the Co-op manager would likely have a very good insight into the suitability of a candidate.

**Our recommendation**

The Co-op could consider having more than one option available at the end of the 4 weeks, e.g. extending the paid placement, or replacing the interview with another form of assessment. Despite its challenges, an interview remains a desirable approach, considering the value of gaining practice in such situations, and in terms of perceptions of fairness. There could however be more guidance for how managers could make sure the candidate is properly briefed and helped to prepare for an interview.

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10 For example see Pret A Manger ‘Rising Stars’ scheme in Annex 4
2.3 Measuring success

The Co-op has publicly stated targets in terms of the number of individuals it hopes to provide opportunities for through Bright Future. In March 2017 the Co-op pledged to offer at least 30 people, who have been rescued from slavery, the opportunity of a paid work placement and a job in their business.\(^{11}\)

We encountered different perspectives on this approach from our interviewees. There were understandable concerns about a focus on numbers, and the possibility that reaching or not reaching an arbitrary figure would determine ‘success’ or ‘failure’ and could undermine the whole initiative.

In contrast to the focus on numbers, many of our respondents were keen to explore a more holistic approach that included measures of impacts on individuals’ lives. It was felt this would put less emphasis on retention of candidates and a binary ‘job/no job’ result that could be equated with success/failure, and more on the ways in which the placements provide an opportunity for personal development, including for example an increase in skills and self awareness. Others, however, were more definite that success should be measured in terms of the extent to which Bright Future provides a pathway to stability through employment.

In an attempt to develop a more detailed picture of the programme’s success, the Co-op created pre- and post-placement surveys to be completed by candidates before and after their placement. The pre-placement questionnaire asked for information about the background and aspirations of work placement candidates. The post-placement questionnaire attempted to assess the views of those who had been on work placements as to its usefulness in transitioning to full-time employment.

Although the pre-placement questionnaire was completed by some of the candidates at the beginning of the process, according to those we interviewed, the post-placement questionnaire had not been taken forward. (See Section 4 for our recommendations on further evaluation.)

\(^{11}\) https://www.co-operative.coop/ethics/bright-future.
3 Risks and mitigation
3 Risks and mitigation

The Bright Future programme raises a number of significant challenges and risks for those taking part in the placements and for the Co-op, its local managers and staff, and charity partners. There are challenges around deciding which individuals receive support, how they are treated, how they are protected and how the Co-op works with different kinds of organisations. Co-op managers also face a range of issues. As numbers participating in Bright Future go up, there is potential for the drop-out rate to increase, if the process currently employed by the programme is not further embedded and improved in order to ensure efficiency and sustainability.
### Table 2. Potential risks and their mitigation, with recommendations for improvements.

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<tr>
<th>Potential risk</th>
<th>Description</th>
<th>Assessment of existing mitigation measures</th>
<th>Our recommendation</th>
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<tr>
<td><strong>Risks to the wellbeing of candidates</strong></td>
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<tr>
<td>1. Inadequate support to facilitate a successful placement</td>
<td>Insufficient allowance made for needs and requirements (eg taking account of personal circumstances, or enabling flexibility to attend police interviews or counselling sessions). The lack of sufficient resources to cover basic clothing, travel and subsistence needs.</td>
<td>During the placement period survivors are expected to be given flexibility around their shift times in recognition that they may have commitments, eg counselling or assisting the police. While uniforms are provided by the Co-op to colleagues, we discovered an example where a survivor could not afford to buy the standard shoes and trousers they were expected to buy to wear under their uniform.</td>
<td>It may be useful to have a clear line of communication and guidance about ‘who to ask’ when a candidate needs additional resources to be able to participate in the programme. The Co-op could consider providing extra help in some cases. This could be through a central ‘Survivors Fund’ that could provide help in the transition to a working routine.</td>
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<td>2. Damage to confidence and self-esteem if the placement ends without a job</td>
<td>Although the placement ends with a job interview, there can be no guarantee of job. It is therefore important to provide support for someone who may not get a job at the end of the placement, or if it does not work out as expected.</td>
<td>Support should continue via the supporting charity, but there is no formal continuation of involvement on the part of the Co-op in the event of an unsuccessful placement. However, we found examples where managers had used their initiative to extend the placement, and provided advice and guidance to help the individual find alternative work.</td>
<td>Expectations of support from charity partners, and the range of potential outcomes for individuals, need to be more clearly communicated before placements begin. There could be a greater range of options for managers to offer to candidates in the event of an unsuccessful placement experience. This could draw on examples of best practice from across the Co-op or via specialised training (eg CV writing skills, interview techniques, etc).</td>
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<td>3. Loss of benefits when entering paid employment</td>
<td>The welfare context for survivors is difficult, and it often represents a potential gamble for them to move into work. We found that knowledge about the welfare situation for survivors was uneven among support workers. One charity referred to a special route for benefits reactivation, but others were unaware of this.</td>
<td>It is the charity’s responsibility to ensure that the individual is ready to work, and that they understand the personal risks of moving from welfare to work. The charity needs to be prepared to support the individual back onto welfare if necessary and needs to be aware this may be a post-placement outcome.</td>
<td>Provision of the most up-to-date advice and guidance about welfare entitlements would be useful and could be of benefit to candidates, the Co-op and charity partners. The implications of the shift to Universal Credit also need to be considered. The Co-op needs to be clear with potential candidates and charity partners before a placement starts as to the limits of their role including with support in bridging the gap between welfare and work.</td>
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<td>4. Lack of long-term stability for those who get jobs</td>
<td>When granted, Discretionary Leave to Remain (DLR) is normally granted to individuals for a limited time (12-30 months) with no certainty of renewal. Candidates with DLR may be taken on by the Co-op with a right to remain in the country which then expires and may not be renewed.</td>
<td>None</td>
<td>The Co-op could collect evidence about long-term effects of DLR rules on survivors of modern slavery by monitoring long-term outcomes of those that participate in its Bright Future programme, sharing this information, as appropriate, with government.</td>
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<td>5. Disclosing the traumatic experiences of those on placements to colleagues</td>
<td>Candidates are advised not to share their story. However, if colleagues become aware they are part of Bright Future, there may be resentment/a perception that someone on a placement is treated differently to other staff (eg if they need time off or a certain rota related to their trafficking, such as seeing police or lawyers).</td>
<td>For reasons of safety and confidentiality, only an individual’s line manager is aware that the person on a placements is a survivor of slavery. No one else in the workplace is told and we were pleased to find that, according to survivors’ testimonies, this policy is followed and other store staff respect this discretion.</td>
<td>None</td>
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<td>6. Failing to recognise and respond to cultural sensitivities</td>
<td>One candidate felt uncomfortable having to handle alcohol in store, but did not feel confident enough to request that she did not do this.</td>
<td>The Co-op has processes and training in place to cope with cultural sensitivities, but this group of workers (and Co-op staff) may highlight the need for more training in terms of cultural understandings.</td>
<td>The Co-op should consider updating guidance for managers drawing on examples and findings of this interim review.</td>
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# Risks relating to Partnerships

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<th>Description</th>
<th>Assessment of existing mitigation measures</th>
<th>Our recommendation</th>
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<tr>
<td><strong>7. Sustainability of survivor support provided by charities</strong></td>
<td>The Co-op is reliant on working with charities that provide ongoing casework and/or individual advocacy support beyond just the positive identification as a survivor of trafficking and to survivors who chose not to enter the NRM. However, this level and type of support varies between individual charities and, not least because it is not currently funded by government. The growth of the programme may be limited by the availability of longer-term support available to survivors to help them move into employment.</td>
<td>None</td>
<td>The Co-op needs to critically assess what each charity partner has in place for long-term support of survivors. The Co-op should share learning from Bright Future with government and with the Independent Anti-Slavery Commissioner, to help make the case for additional resources to enable a wider and more consistent coverage of longer-term support of survivors. The Co-op should continue to evaluate outcomes for participants in Bright Future to demonstrate what can be achieved when long-term support is in place.</td>
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<td><strong>8. Ineffective communication between charities and the Co-op</strong></td>
<td>We encountered some examples of poor communication between the Co-op and its charity partners. In one case the Co-op manager thought the charity partner would be meeting with the candidate every week, whereas in the document it actually says a weekly phone-call (with a meeting if needed). In another case a placing charity had the perception that the placement was a job ‘from day one’ (i.e. that their role had ended).</td>
<td>The Bright Future programme is underpinned by a clear ‘division of labour’ that is intended to avoid any misunderstanding of each party’s role. As one charity put it, “the Co-op understood that we were there and we wouldn’t expect them to take on any care in the workplace; that is what we do and what we are good at”.</td>
<td>Several interviewees suggested that “the communication has to be stronger to ensure expectations ‘line up’”. A dedicated staff member could help address this, along with an enhanced agreement or MOU between the Co-op and the charity partner.</td>
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<td><strong>9. Inconsistent support across different charities</strong></td>
<td>There were concerns about the level of consistency across charities. As one charity put it, “From our experience support [for the candidate] has to be ongoing and consistent. The biggest risk in engaging with other charities is that we have to ensure that this principle exists. In our area this is now sorted and we can do this. But it is not so clear elsewhere in the country.”</td>
<td>Expectations and roles are specified within existing guidelines and common documents including the ‘back to work filter’ and principle of regular contact during placement.</td>
<td>Support for survivors should be tailored and cannot be completely consistent. However, we became aware that there is difference of opinion on the ‘back to work’ filter, with some charities happy to use it and others either suggesting it sets the bar too high or too low. This and the other documents that form part of Bright Future should be revisited periodically, and in light of our review, to improve then and determine whether additional information regarding risks/mitigation or process and best practice could be incorporated.</td>
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### Business/corporate risks

<table>
<thead>
<tr>
<th>Potential risk</th>
<th>Description</th>
<th>Assessment of existing mitigation measures</th>
<th>Our recommendation</th>
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<tr>
<td>10. Risks to brand</td>
<td>The Bright Future programme could be threatened by wider criticism around the modern slavery agenda, the level of pay given to those on placements, or the employment of migrant workers. As one interviewee put it, “Some consumers or customers may be critical, seeing it maybe as a way of getting cheap employees”. Another mentioned “apprehension about being able to talk in the current climate about migrant labour”.</td>
<td>The Co-op has introduced Bright Future to the wider public in a measured and sensible way, gaining positive media coverage and mentions in the parliamentary context. The discussion of Bright Future at the Co-op AGM in May 2017 led to a successful motion. The response of the members was “this is shocking and something should be done”. Commissioning this independent interim review can be considered another part of an appropriate strategy to mitigate risk to brand.</td>
<td>None</td>
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<td>11. Legal risks</td>
<td>According to one interviewee from the Co-op’s HR team there were concerns that, when a placement ends, normal dismissal procedures were not being followed (on the basis these would place undue stress on an individual). This may mean the Co-op is leaving itself open to legal action.</td>
<td>The decision to reduce the burden of exit procedures is well-intentioned, to help keep things positive and avoid unnecessary stress or re-experiencing of distress in a workplace context.</td>
<td>Normal employment procedures should be followed for those on placements. If these are not considered appropriate the Co-op should take legal advice from specialist anti-trafficking lawyers with employment expertise as to how they can follow exit and other procedures without causing unnecessary stress to the individual. These procedures should be clear and explained to all (using interpretation if necessary). If the scheme becomes ‘informal employment’ this potentially leaves workers open to exploitation.</td>
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<td>12. Lack of staff capacity to manage the Bright Future ‘matching process’</td>
<td>Implementation of Bright Future is currently reliant on a small number of individuals when it comes to matching candidates with opportunities, and has been done manually (i.e. without any central database or process). This dependence on a small number of Co-op staff creates risks for the sustainability of the programme.</td>
<td>One interviewee from the Policy and Campaigns team confirmed that “We are making efforts to find [Bright Future] a permanent home.” What came through very strongly from many of our interviews was that Co-op staff have been determined to make Bright Future work, and there was a real sense of disappointment if it did not work out for anyone on placements.</td>
<td>The Co-op should consider putting in place a clear structure with more staff to resource Bright Future, including more systematised logging of available placements, possibly through a database. For example, one or two staff could be permanently allocated to the programme, with the possibility of staff being seconded to the Co-op from charities to help run it. As one interviewee said “I am full of admiration for how far this initiative has got. [The Group Policy and Campaigns team] has been doggedly matching people, and there are a lot of challenges…”</td>
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12 At the 2017 AGM members voted overwhelmingly to champion a better way of doing business by tackling modern slavery (https://www.co-operative.coop/get-involved/agm-modern-slavery).
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<tr>
<td>Failure to meet targets</td>
<td>As the target number of placements increases (as is likely), there is a commensurate increase in the likelihood that the target will be missed. Only a small proportion of the survivors currently identified in the UK meet the criteria which the Co-op has set for participation in Bright Future (see Annex 3). Only 12% of confirmed survivors of trafficking were granted a ‘residence permit’ (Discretionary Leave to Remain) in 2015. As one interviewee told us, “The programme is really okay, but it is difficult to identify placements. Few really fall within the narrow criteria, for example ‘able to work with status’. This risk is likely to intensify considering the potential outcomes of Brexit (eg further restrictions on freedom of movement reducing the pool of victims who are eligible for placements).</td>
<td>The Co-op has mitigated this risk primarily by making the Bright Future programme high-profile - publicising it to members and the wider public, and increasing the number of charity partners involved in the programme.</td>
<td>The Co-op should continue its policy of accepting all those with the Right to Work who are put forward by charities. Efforts should be made to include all charities working with victims across the UK. Greater efforts should be made to diversify the kinds of job placements that are available (ie in different parts of the Co-op’s business, and with other business partners). Participation criteria should remain as wide as possible.</td>
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<td>Lack of suitable placements</td>
<td>The Bright Future programme is currently limited to Co-op’s food stores and distribution centres. However, jobs in these settings may not be suitable for all candidates, some of whom may not want a customer-facing role. One interviewee pointed out that “survivors may want a range of employment options rather than low wage low skill service sector work such as retail”.</td>
<td>The Co-op is a large business, with a large network of commercial relationships. There may be potential to expand the scheme into other parts of the business in the future. The Co-op has publicly stated its commitment to engage with its own suppliers and other UK businesses to encourage others to adopt the Bright Future model.</td>
<td>As noted already in this report, the Bright Future programme is in its early stages. It is important to have solid foundations in place in order to mitigate the risks of expanding too quickly.</td>
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4 Findings and recommendations
4.1. Summary of findings

As set out in the Terms of Reference (see Annex 1) we were asked by the Co-op to assess the relevance, efficiency and effectiveness of Bright Future, and to consider its sustainability and results. We set out detailed findings regarding the Bright Future process in Table 1.

Relevance
Our research leads us to conclude that the Bright Future programme, based on a network of relationships between the Co-op and charity partners, is relevant to the needs of stakeholders in the current context of the challenges around survivor support and rehabilitation. Bright Future forges a clear pathway for one group of survivors of modern slavery – those with a right to work, who are ready and able to work, who have a suitable level of English and emotional stability – to rebuild their lives. It provides a remarkable opportunity for survivors (who are ready and able to do so) to experience decent work, and to enjoy the dignity and personal stability which goes with this.

However, a number of areas could be improved, especially if Bright Future is to be sustainable, or scaled up to a larger, national programme.

Efficiency and effectiveness
Our analysis of the process is that it works and has been effective in matching survivors with placements and creating good working relationships with charity partners. However, for each stage or component in the Bright Future process there were aspects that could have been more efficient or clear, instructions that could have been more detailed, and additional help that could have made a significant difference.

Sustainability
The long-term sustainability of Bright Future in its current form is questionable. There is recognition that for placements to work there is currently a requirement for Co-op managers and HR to go ‘above and beyond’ their normal role. At its current scale, the Co-op as a business can absorb the extra input hours and other contributions from enthusiastic individuals who are committed to making it a success. And, indeed, we found many such individuals amongst our Co-op interviewees. However, the programme needs to be further embedded and we encountered enthusiasm for the programme to be scaled up. In either scenario there needs to be serious conversations about both the resources and training required and who should provide them, and this is something we turn to in more detail in the recommendations (Section 4.2).

Results
The main goal of the programme to date has been to provide work placements for 30 survivors in its first year. However, as outlined in Section 1.2, there are a range of motivations for the Co-op becoming involved in this area. For this reason, we believe that an assessment of outcomes should include a broader understanding of impact. The testimonies of the survivors we interviewed through this research demonstrate the profound impact that Bright Future has had (or could have) on their lives. However, the Co-op should also be commended for the positive impacts of Bright Future on other stakeholders. We found that all those involved – whether they be the Co-op’s HR team, managers, or charity partners and case workers – have all been able to share in the vision of the initiative.
4.2. Recommendations

In addition to the specific recommendations contained in Tables 1 and 2, we would like to make general recommendations in the following areas: communication and partnership; maintaining a successful balance; scaling up the programme; influencing policy; and further evaluation.

1) Communication and partnership

Lines of communication with charities could have been stronger in places – both to deal with problems, and to ensure there are clear understandings of expectations. Expectations among partners need to be made clearer to ensure that survivors are properly supported and do not fall between the gaps. For example, assumptions may be made about who is providing support, the level of support during a placement, and the point at which a placement is deemed appropriate. We believe that more could be done to communicate the key elements of the programme and to prepare those on placements and Co-op managers.

We would recommend:

- At least one full induction day at the start of the placement, followed by optional additional days if considered necessary.
- Sharing best practice between managers regarding their experiences.
- Providing more information to prospective candidates through a ‘Starter Pack’, made available in a clear and simple language.
- A standard option to use a translator to deal with any significant problems.

This report may prove to be a useful source of material for prospective charity partners in terms of explaining the rationale, process and potential risks of participating in Bright Future. A summary version could be created specifically for this purpose. Some of the testimonies from store and depot managers, those on placements and partner organisations could be made available to help build brief and targeted ‘examples of best practice’ documents.

2) Striking a successful balance

The Bright Future programme sits somewhere between a job placement programme and a ‘back to work’ scheme. This raises a series of questions moving forward about where the Co-op wants its responsibility to end and the responsibility of government or its charity partners to begin.

We would recommend:

- The Co-op considering increasing financial and practical support for individuals who are embarking on Bright Future, eg through a ‘Survivors Fund’ to help with some of the costs of starting work (travel, purchase of clothing, etc).
- Having dedicated Co-op staff to improve and streamline the matching process, and to manage the partnerships with charities.
- Developing the current Work Agreement form into something approaching a (MOU) between charities and the Co-op which makes clear respective expectations and responsibilities.
• Having an option to change the length of placements. Four weeks was not long enough for some survivors, and managers used their initiative to extend it - this should become a stated option.

• Improving the ‘back to work filter’. This has been a successful document, but could benefit from a re-draft in light of feedback from all partners involved in the programme.

The Jericho and Pret a Manger programmes provide useful guides (see Annex 4). The Jericho programme may be more suitable for those who are not quite ready for a regular job placement, while Pret’s programme illustrates the value of providing additional financial support (entrants are given a £100 voucher to allow them to buy clothes and extras they might need to be ready for work).

“The is such an important initiative it would be disappointing if its benefits could only be experienced in one part of the UK. There is a clear logic to creating a national scale system, and this could go hand in hand with an enhancement of systems and processes to allow for an increased number of placements.”

3) Scaling up the programme

This is such an important initiative it would be disappointing if its benefits could only be experienced in one part of the UK. There is a clear logic to creating a national scale system, and this could go hand in hand with an enhancement of systems and processes to allow for an increased number of placements. There were mixed opinions on how to scale up; this should be done carefully, with further evaluations conducted periodically to check outcomes. This will require mapping the availability of appropriate support organisations in other parts of the UK.

We would recommend:

• Increasing staff resources within the Co-op to have dedicated individuals to improve the matching process and maintain relationships with partners.

• Complementing this with the creation of a database to help with matching and also to monitor and facilitate bespoke aftercare within a basic framework for survivors in partnership with charities.

• Maintaining a wide range of diverse partners and adding more charities to support the initiative as the number of placements increases, building on one of the core strengths of the programme.
4) Influencing policy

Bright Future has great potential to create benefits for the individuals on placements, and for the Co-op and its charity partners. But the prospect of a larger national programme inevitably raises the question about the balance between the role of business, civil society and the government.

We would recommend:

• The Co-op using the evidence gathered from this review, and through its experience with Bright Future, to continue to engage with government about long-term support for survivors - while being clear that the Bright Future model is only suitable for those survivors who are work ready.

• The Co-op urging the government to follow the recommendation from the Work and Pensions Select Committee’s inquiry into Modern Slavery (March 2017) that “All confirmed victims of modern slavery should be given at least one year’s leave to remain with a personal plan for their recovery, which should act as a social passport to support for at least the 12 month period of leave to remain”14. Committee rejects the argument that this would create a pull factor to the UK, for slave masters or victims.” This recommendation would give survivors who are ready to work access to Bright Future as an option to rebuild their lives and restore their dignity.

Lord McColl of Dulwich has tabled a Private Members’ Bill which, if enacted, would provide for confirmed adult victims of trafficking to receive a grant of leave to remain for 12 months, together with assistance and support during this period. The Bill was publicly supported by the Co-op and secured significant support from Peers at second reading in the House of Lords on 8 September 2017. If the Bill was passed, the granting of a residence permit to victims who are positively identified as trafficked, would do much to facilitate the Bright Future model of supporting survivors to rebuild their lives through decent work, by granting those victims leave to remain with the right to work15. At the time of writing the Bill is awaiting its Committee Stage.

15 With the caveat that expectations would be that, considering the political climate around immigration, any fixed-term grant of leave would inevitably create issues around possibility to renew.
5) Further evaluation

Finally, as mentioned previously in this report, only a relatively small number of placements have started since Bright Future was launched, so the programme is in its infancy. This interim review is the first formal review to take place. While an attempt was made to introduce pre- and post-placement surveys, these were found not to have been implemented consistently.

We would recommend:

• Introducing brief face-to-face interviews pre- and post-placement, to be conducted by a member of the Co-op HR team.

• Re-evaluating the programme periodically (every year) to monitor progress, and publicise success.

• Examining the situation of survivors who took up placements or possibly employment with the Co-op and tracking their progress over time.

Tracking the progress of survivors is particularly important given that we are aware that there is very little knowledge about what happens in the longer-term. For example, once in a job, survivors may have less flexibility than they did while on a placement. If individuals are taking part in criminal prosecutions or compensation claims this may take a lot of time across several years, and it would be important to understand what challenges this poses for them.

6) Conclusions

In our view the Co-op’s Bright Future programme represents an extremely valuable initiative. Our conclusion is that it constitutes a qualified success thus far, with good foundations to grow and become an even more beneficial programme in the future. We hope that our recommendations play a constructive role in the programme’s development. Bright Future is a significant collaboration between a major UK business and charities working to support those who have experienced modern slavery. As such, it puts the Co-op potentially at the forefront of businesses which are committed to combating modern slavery. This should be commended as an illustration of where business can help realise the goals of those who drafted the supply chains clause of the Modern Slavery Act 2015. For many supporting this legislation, Section 54 (transparency in supply chains) was about pushing businesses to do much more than simply producing what are largely aspirational modern slavery and human trafficking statements.

Previous reports by the Human Trafficking Foundation and others in the sector have addressed the issue of support for survivors. All of them point to the considerable hurdles for this group following the end of government support, particularly in terms of them getting back into regular employment, establishing a stable personal and economic situation and thereby reducing their vulnerability to re-trafficking. These issues were confirmed in the interviews we conducted for this report.

This report highlights the importance of Executive-level commitment from businesses when putting together innovative programmes that seek to benefit groups that typically face discrimination in the labour market.

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Annexes
Annex 1. Terms of Reference

At the end of July 2017, the Co-op issued a call for expressions of interest and then tenders to undertake an interim review of the Bright Future programme, covering the period January–August 2017. The Co-op intended that the focus of this independent review should be on effectiveness, efficiency and lessons, and specifically to:

1. Review the approach of Bright Future to date (including progress against objectives, achievements and challenges);
2. Review the Bright Future model and its effectiveness; and
3. Draw out lessons and recommendations for the next phase of the programme.

In terms of specific objectives, the Co-op asked reviewers to comment on:

1. Relevance: How relevant is the programme to the needs of stakeholders, in the current context of survivor support and rehabilitation?
2. Efficiency: How well is the Co-op using available resources to achieve the desired results?

To consider:

• Effectiveness of current charity partnerships (ie with City Hearts and Snowdrop Project); and
• Ways of working in the Co-op.

3. Effectiveness: How successful has the programme been to date in achieving its goals?

To consider:

• the distinctiveness of the Co-op’s initiative and how it complements/adds to the work being done by others to support survivors of modern slavery;
• learning and innovation – the extent to which the Co-op is learning from work, incorporating into improved performance, producing general replicable learning that we can incorporate into best practice and share with other; and
• whether appropriate monitoring and data capture is in place to monitor the effectiveness of the initiative in the long-term.

4. Sustainability: To what extent is the Bright Future programme and its results likely to be sustainable within the Co-op?

5. Results: What effect has the programme had on survivors to date (intended/unintended, positive/negative)? What effect has it had on other stakeholders, including colleagues and partners?
Annex 2. Methods for this independent Interim Review

This study used mixed methods of research: as well as interviews, we drew on the Co-op’s own internal policy documents together with a search of material relating to the development of anti-slavery work across the country. In conducting this research we sought input from a wide range of stakeholders, including those within the Co-op’s business and among its networks, partners and organisations operating in the field of anti-trafficking and modern slavery.

Following our initial analysis of the Bright Future documentation, we carried out interviews with individuals from five groups:

1. Internal (Co-op) key informants (eg the CEO, HR staff, colleagues in Group Policy and Campaigns).
2. Internal (Co-op) placements staff in the field (eg depot and store managers).
3. External stakeholders (staff from organisations and agencies involved in helping to shape the programme, and others, involved in work around anti-trafficking and modern slavery).
4. External charity partners (eg those organisations forwarding potential candidates for placements).
5. Placement candidates (eg those on, or being considered for, work placements through the Bright Future Programme).

Different methods for carrying out the interviews and obtaining informed consent were used for each of these groups. For those on the placements (ie survivors of modern slavery), additional measures were put in place to provide protection for this potentially vulnerable group. This included a protocol in case of any experience (or re-experience) of distress, a method of contact that emphasised the non-obligation to participate, clear communication of the aims/objectives of the research, and assurances regarding anonymity and the ability to withdraw from the research. If permission was given, then interviews were recorded. Notes were taken and transcriptions were made of recorded interviews for subsequent content analysis.

18 Balch and Craig are co-convenors of the Modern Slavery Research Consortium, a national network of more than 200 groups and organisations involved in research, policy, practice and consultancy on modern slavery. We were able to write to the network to establish the existence of any similar programmes of work across the country. See Annex 4.
Annex 3. Conditions of acceptance on Bright Future and permission to work

Currently, to meet the requirements of a placement on the Bright Future programme survivors have to:

- Have a suitable level of English.
- Be in a fit mental state to take on the placement.
- Want to do the placement.
- Be supported by a charity that has links with and refers into the programme, and is able to offer casework and individual support in conjunction with the programme.
- Have permission to work in the UK.

Survivors of trafficking who have permission to work are, or have, the following:

- Are British citizens.
- Have Indefinite Leave to Remain.
- Are an EU or EEA national.
- Have refugee status (as the result of a successful asylum claim which may or may not be linked to their trafficking).
- Have been granted a ‘Residence Permit’ (a grant of Discretionary Leave to Remain) following the positive Conclusive Grounds decision through the National Referral Mechanism (NRM).
- Have another form of leave such as the Overseas Domestic Worker visa.
Annex 4. Other relevant projects for comparison

Although we were engaged to review the effectiveness of the Co-op’s model for helping modern slavery survivors back into work, and not explicitly to compare it with other possible models, we felt it might be useful to see if there were other models available within the UK espousing the same broad goals. We have not interrogated these other models, but have included below material published by the organisations involved. It is clear that some programmes are much more modest in their goals and in the resources made available to support them, although the overall aim may be the same; some have developed a more limited range of data-gathering instruments. None, it appears, have the scope of the Co-op model, and most have yet to attempt any kind of detailed evaluation of their work. The Sophie Hayes Foundation has, however, engaged an intern to review its own work in this area and that report should be available shortly.

Pret a Manger: Rising Stars

Pret a Manger began its Rising Stars programme ten years ago. The programme works with people that have been living on the streets, or have a criminal record – people who have significant barriers to accessing decent work. The project is funded by the Pret Foundation charity.

They provide a three-month training programme that works alongside the standard training programme that all Pret a Manger employees undertake, but that provides more help and support. They take over 50 Rising Stars each year and have a completion rate of over 80%.

Since 2015 Pret has developed the Shooting Stars programme, which takes eight graduate Rising Stars and gives them an eight month programme designed to provide them with the skills to progress up the career ladder.

Support provided through the programme includes:
• Work with charity partners – they have two full-time staff members who initially meet and match depending on needs, after a detailed referral form is completed by the charity.
• Weekly peer group meetings.
• ESOL classes.
• Referral to counselling if needed.
• £100 voucher before starting work to enable candidates to be ‘ready for work’ in terms of clothes, toiletries, etc.

19 https://www.pret.co.uk/en-gb/rising-stars-programme
**Jericho**

The Jericho Foundation\(^{20}\), based in Birmingham, supports disadvantaged people to become fulfilled, skilled and employed. It was established in 1993 to help disadvantaged people in general, and has more recently operated through the eight social enterprises it has set up. Jericho’s interest in modern slavery survivors is relatively recent.

Jericho describes itself as:

- working with disadvantaged people who are struggling;
- providing work in its eco-friendly social enterprises;
- delivering a package of support, guidance and training; and
- helping people to become a part of their community.

**Staffline**

Staffline\(^{21}\) is a general employment agency established in 1986. It works largely within the West Midlands to provide temporary and permanent jobs based in a number of industrial sectors. Staffline has recently partnered with the West Midlands Anti-Slavery Network and with partner charities within the network to find jobs for survivors of modern slavery. It does so through a structured process which includes referral forms and guidance documents for potential employers.

Staffline currently tries to refer survivors (from charities) to a variety of its clients (businesses), mainly in the West Midlands. It works with different sectors, including food, agriculture, logistics and distribution - depending on the candidate’s level of English and mobility.

Staffline has made six referrals to date. Not all candidates have been successful due to a variety of reasons including: level of English, ability to do certain shifts, demand for more hours than they can offer, and behavioural issues of various kinds.

**Redcommunity**

Redcommunity\(^{22}\) is based in Wales. It started in 2013 as a prayer meeting for those affected by trafficking and prostitution. Currently, its main active project is a coffee roasting enterprise, Manumit Coffee Roasters\(^{23}\) which is committed to providing specialty coffee that is slave-free on three levels:

1. Sourcing coffee that is slavery free at source.
2. Training and employing survivors of modern slavery to roast, package and distribute the coffee (they currently roast for eight hours per week and employ two survivors of slavery).
3. Investing all profits in anti-slavery project (local and global).

The organiser, Dai Hankey, also runs a project called Embrace that is about befriending survivors of slavery in South Wales. The project currently has about fifteen live befriending relationships and they are training more befrienders all the time.

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\(^{20}\) www.jericho.org.uk  
\(^{21}\) www.staffline.co.uk  
\(^{22}\) www.redcommunity.co.uk  
\(^{23}\) manumitcoffee.co.uk
Sophie Hayes Foundation
The Sophie Hayes Foundation\textsuperscript{24} is already working with the Co-op and making referrals into the Bright Future programme. However the Foundation’s main focus - supporting survivors back into work through workshops, education, mentoring, coaching and bespoke placements through its Day 46 Programme - pre-dates the Co-op’s Bright Future programme. The Foundation has worked with over 70 female survivors of trafficking in the last 18 months, helping women to grow in self-reported resilience, employability and social support, as well as to access training, education or work. It has partnerships with businesses and colleges across London which provide training and work shadowing opportunities, and has received Big Lottery funding to expand its employability programme across the country over the next three years. A number of partners are already interested in working with the Foundation across the UK due to the popularity of the programme with the women who attend it.

The Foundation has just carried out a review of its services, which will provide fresh data and learning to share.

Other initiatives
More broadly, there are a number of agencies which place domestic workers who are freed from exploitative conditions. Overseas Domestic Workers who entered the UK on the overseas domestic worker visa before April 2012 have permission to change employer (but not work sector). Jobs secured in this way do not have the support which Bright Future offers.

The multi-stakeholder initiative Stronger Together\textsuperscript{25} suggests that a significant number of organisations which it is working with are exploring the possibility of similar schemes to Bright Future, and it is planning to convene a number of organisations to discuss scaling up to a national programme.

\textsuperscript{24} www.sophiehayesfoundation.org
\textsuperscript{25} http://strongertogether.org/
In our view the Co-op’s Bright Future programme constitutes an extremely valuable initiative that can point to success, providing the foundations to grow. It puts the Co-op at the forefront of business efforts to address modern slavery in the UK. The report highlights the importance of continued commitment from the Co-op from the highest level to sustain the programme and ensure its success moving forward.

University of Liverpool