

MODERN SLAVERY STATEMENT

INTRODUCTION

This statement is issued by Digital Ventures Services Limited and Digital Ventures Holding Limited, which between them own and operate Vivastreet.

Neither Digital Ventures Services Limited nor Digital Ventures Holding Limited is required by law to publish a Modern Slavery Statement, as neither company meets the criteria set out under section 54 of the Modern Slavery Act 2015.

However, as part of our commitment to provide a safe and trusted platform for our users, we have chosen to publish this report, setting out the steps that we take to minimize the risk of modern slavery and human trafficking occurring within our own operations, our supply chain, and our userbase. We also report on how we engage with stakeholders, including law enforcement agencies, to act against modern slavery.

ABOUT US

Digital Ventures Services Limited and Digital Ventures Holding Limited are registered in England and Wales, under company numbers 11224513 and 11222356. Our registered address is Westgate House, 9 Holborn, London, EC1N 2LL.

Vivastreet is a user-generated advertising platform that allows users to post adverts for goods and services across a broad range of categories. We employ 68 staff in the United Kingdom.

At Vivastreet, our top priority is to provide a safe and trusted platform for our community. At its heart, that means operating our platform in a responsible manner, promoting safety and security, and working collaboratively with partners. We stand against exploitation in all its forms and have put in place robust measures to prevent modern slavery and human trafficking occurring within our business, our suppliers, and our userbase. However, we recognise that the threat posed by those who seek to exploit our platform for the purposes of modern slavery and human trafficking is ever-changing, and so we are committed to continuously upgrading and refining our safeguarding measures.

We seek to build relationships with other stakeholders with an interest in preventing online exploitation, and have partnered with the following organisations (further details are set out in our [Corporate Responsibility policy](#)):

National Ugly Mugs

NUM provide greater access to justice and protection for sex workers across the UK. We provide our sex worker users with free membership of NUM, so that they can benefit from NUM's online warning system, receiving alerts on dangerous individuals in and around their location, and enabling them to screen clients more effectively.

Through our work together we look to help those who see sex work as a positive career choice work as safely as possible, while identifying and supporting those who carry out sex work because they face challenging personal circumstances. Together with NUM we are exploring ways to further support this second group, through dedicated wellbeing and career services, as part of a pioneering new partnership to help those who wish to transition out of sex work do so in a supportive and non-judgmental environment.

ClientEye

ClientEye's app is a subscription-based, global safety scheme for sex workers, enabling anonymous reporting of problem clients with fellow app users. We provide financial support and advertising space for this invaluable, sex worker-led tool, while also offering any customer advertising in our Escorts and Massage category access to the ClientEye service for free, via the Vivastreet platform.

Unseen

Unseen, which operates the UK's Modern Slavery Helpline, aim to bring an end to slavery worldwide, working in communities and offering support to those in need. Through our partnership, Vivastreet users can report any concerns about potential exploitation via a 'Concerns of Exploitation' button on each advert. Any reports made using this feature go directly to Unseen, who use their experience and expertise in this area to promptly respond to the issue.

IncomeMax

Specialist charity IncomeMax is a social enterprise that helps people who are struggling financially to maximise their household income. The partnership has so far uncovered hundreds of thousands of pounds of unclaimed benefits and eligible income for sex workers, providing valuable support to those in the community who are facing financial hardship, with a view to ensuring that financial pressures do not push sex workers into potentially dangerous or exploitative situations.

Stop the Traffik

Stop the Traffik is an organisation working to prevent human trafficking globally through their innovative intelligence-led approach. Vivastreet commissioned Stop the Traffik to develop industry-first training programmes for all Vivastreet customer-facing staff on how to spot potential harm and how best to handle circumstances in which potential harms are identified. We continue to work closely with Stop the Traffik to strengthen our risk mitigation framework and safeguarding procedures.

Crimestoppers

Crimestoppers is the UK's leading independent charity that gives people the power to speak up and stop crime anonymously. Vivastreet operates a formal partnership with Crimestoppers, whereby our customers and users can report their concerns directly to law enforcement in a safe, controlled and anonymous manner.

AI internet safety organisation

We have undertaken an industry first pilot partnership with an internationally recognised artificial intelligence and open-source internet safety organisation who are focused on protecting the vulnerable and ending systemic exploitation.

We work together to prevent, identify and remove potentially exploitative or criminal content from our platform.

POLICIES IN RELATION TO MODERN SLAVERY AND HUMAN TRAFFICKING

We have a wide range of policies in place that are directed towards reducing the risk of modern slavery and human trafficking occurring within our business, our supply chain, and our userbase.

- **Responsible Business policy**

Our [Corporate Responsibility policy](#) sets out how we operate our platform and work with stakeholders, so as to minimize the threat from those who seek to use our platform for the purposes of exploitation. The policy sets out our approach to platform security – which is directed towards detecting, deleting and reporting potentially exploitative content – as well as explaining how we partner with stakeholders including law enforcement, government and the charity sector, so that we can work together to fight modern slavery and human trafficking.

- **Terms and Conditions, and Posting Guidelines**

Our [Terms and Conditions](#) and [Posting Guidelines](#) make clear that all users must be 18 or over, and explicitly prohibit the posting of exploitative content. The policies also make clear that we share information with law enforcement agencies, where such evidence is relevant to a police investigation.

- **Equal Opportunity and Diversity policy**

- **Non-Harassment and Bullying policy**

- **Modern Slavery policy**

- **Privacy policy**

- **Confidential Reporting and Whistleblowing policy**

- **Grievance policy**

DUE DILIGENCE AND RISK MANAGEMENT

We have identified three distinct areas in which we seek to recognize and mitigate the risks posed by modern slavery and human trafficking:

1. Our business
2. Our userbase
3. Our supply chain

The sections below set out the work we do to prevent modern slavery and human trafficking arising from within each group.

1. Our business

We consider the risk of modern slavery and human trafficking occurring within our direct business operations to be extremely low. As a medium-sized business, our staff are all either employed directly or are engaged on a contract basis, which means that senior management have direct visibility of the nature of their employment relationship. All staff are made aware of the policies set out above, and we have a number of routes through which employees can report concerns about modern slavery and human trafficking.

2. Our userbase

Vivastreet allows users to post adverts for a broad range of goods and services, and we know that our userbase includes sex workers. Sex work is legal in the UK, and sex workers are entitled to use online platforms to advertise their services. Nevertheless, we recognise that there are significant risks involved in carrying these adverts, as their presence may lead to those involved in modern slavery or human trafficking seeking to misuse our platform.

We take our responsibilities in this area seriously, and our commitment to user safety and wellbeing includes operating robust safety checks and platform security measures, as well as working closely with stakeholders such as law enforcement, government and the voluntary sector. By way of example, we are currently undertaking a pilot project with the Tackling Organised Exploitation (TOEX) National Team, under which all our proactive referrals to law enforcement in England and Wales are handled on a centralised basis. We have also established formal referral pathways with the Police Scotland National Human Trafficking Centre, for Scottish referrals, and the Garda National Human Trafficking and MDS Unit, for Irish referrals. Our [Responsible Business policy](#) sets out in more detail the steps we take to identify and mitigate risks of modern slavery and human trafficking within our userbase.

In addition to the risks around modern slavery and human trafficking, we recognize that our adult categories also give rise to the risk of so-called “sex for rent” adverts, where housing is offered in exchange for sexual services. These adverts are illegal within the UK and our [Posting Guidelines](#) make clear that they are not permitted on Vivastreet. We have a wide range of measures in place, including automated detection and proactive human moderation, to detect and delete any adverts of this nature.

The below case studies provide real-life examples of how our safety and security measures have been utilized to detect potential exploitation and respond appropriately.

Case study 1:

An online report was made to the Vivastreet customer services team regarding an advert posted online in the ‘Escort and Massage’ category. The report, made directly through the website’s ‘Report this Ad’ feature, included wording that indicated the sex worker was a

victim of modern slavery, and provided an address. Vivastreet's dedicated Safeguarding Team immediately investigated the advert and account that had been reported and compiled all associated information into a single actionable report. This information was then immediately disseminated to the relevant police force, followed up by a telephone notification, for them to undertake urgent enquiries. The police force advised that from the information provided, they were able to quickly identify those involved and conduct safeguarding visits to the location. Furthermore, they confirmed the individuals involved were recently suspected of serious offences committed against sex workers.

Case Study 2:

A male customer phoned Vivastreet's customer service team regarding an issue with an online adult escort advertisement that he had placed on the platform. The customer service agent requested to speak directly to the female advertised within the advert, as is a standard procedure, and the male refused to allow the female to speak. This raised concerns for the safety and autonomy of the female, by the customer services staff, who undertake extensive, regular training to identify and address potential risks on the website.

Vivastreet carried out further investigative work, including looking into previous advertisements posted from the same account and checking for any related complaints/reported concerns. Staff attempted to contact the female advertised the following day but were again refused access to her by a male. Vivastreet's customer service and safeguarding teams worked together to collate all associated information relating to this account and compiled it into a single actionable report, which was then sent immediately to relevant police force for urgent enquiries to be undertaken. The police force were grateful for the information provided and undertook an urgent welfare visit to the location to speak with the female advertised and seek to identify any causes for concern.

3. Our supply chain

The nature of our supply chain is such that our suppliers are limited to those who provide either a) office supplies and services to our business premises, and b) technological services underpinning the operations of our web platform. The businesses within our supply chain tend to be large, multinational companies that maintain an elevated approach towards detecting and mitigating the risks posed by modern slavery and human trafficking and publish their own modern slavery statements, and so we consider the risks arising from these businesses to be extremely low. However, notwithstanding this, we have identified two areas where we consider that there is the potential for abuse to occur that may lead to increased risks of modern slavery and human trafficking:

- Identity verification
Under our [Terms and Conditions](#), advertisers on Vivastreet must be over the age of 18. We use a third-party age verification system for advertisers in our site who fall into certain higher-risk groups, to gain assurance that these advertisers are over the age of 18. We incentivize users to undergo the age verification process, by allowing those who do so to display a badge on their advert that confirms they have been age verified.
We recognize that contracting out this service to a third-party provider introduces an element of risk, in that we do not have direct oversight of the measures used for identity verification, and that any successful circumvention of those measures could lead to those under the age of 18 being exploited via our platform.
To mitigate this risk we have contracted Yoti, the digital identity company, to provide our identity verification services. Yoti became the first company to be certified by the

UK Government as a digital identity service provider, in 2022, and is trusted by the government to provide identity verification for criminal records checks on behalf of the UK Disclosure and Barring Service (DBS). In our due diligence of Yoti we noted that it has in place an independent ethics board, and publishes its own Modern Slavery Statement.

- Digital payment methods

We permit users to pay to place adverts via Neosurf, an online voucher that can be used in place of a debit or credit card on an anonymous basis. Our rationale for allowing this mode of payment is that sex workers tell us that they face societal stigma as a result of the nature of their work, and as a result they fear disclosing personal information to third-parties such as Vivastreet and want to have the option of an anonymous payment method.

We recognize that allowing the use of Neosurf vouchers could be exploited by those involved in modern slavery and human trafficking, as they may seek to abuse our platform to advertise trafficking victims, without needing to disclose personal information that would assist law enforcement in identifying and prosecuting them. Through our engagement with law enforcement we are acutely aware of this risk, and we have a number of mitigatory measures in place:

- *First payment via credit/debit card*

Our payment policy is that no user can use a Neosurf voucher to pay for an advert without first transacting via a conventional credit or debit card. This ensures that we have documented the user bank account details for all accounts transacting via Neosurf voucher.

- *Due diligence around Neosurf*

In the course of allowing payments via Neosurf voucher, we sought further information from Safe-Voucher Limited, the company that operates the service, as to the steps taken to prevent abuse of their system. The company states that it is licensed by the Financial Conduct Authority as a distributor of electronic money, and that its policy is “to prevent people engaged in money laundering, fraud and other financial crimes, including terrorist financing, from using our services”.

We have been provided with Safe-Voucher Limited’s KYC (Know Your Customer) policy, which sets out that any Neosurf user looking to deposit more than £150 per month in their Neosurf account must provide ID documents and proof of address. We have also been provided with SafeVoucher Limited’s Data Protection policy, which sets out that the company will provide customer information to law enforcement where legally obliged to do so.

- *Spend threshold tracking*

We track the use of Neosurf payment by user account, and have certain internal thresholds, spend above which triggers alerts within our system, so that the account can be reviewed, and appropriate action taken.

- *Law enforcement engagement*

We regularly engage with law enforcement in relation to the use of Neosurf, and work to ensure that officers investigating cases involving the use of Neosurf vouchers are aware of the information available to their investigation, including – for example – the fact that where vouchers were purchased via a high street retail outlet, CCTV footage of the purchaser may be available.

TRACKING OUR PERFORMANCE IN STOPPING MSHT

We recognise that the threat posed by those who seek to exploit our platform for the purposes of modern slavery and human trafficking is ever-changing, and so we are committed to continuously upgrading and refining our safeguarding measures.

We track performance in the areas in which we consider there to be a heightened risk of exploitation, and publish annual performance metrics in our [Transparency Report](#). This report sets out the measures we have deployed in countering modern slavery and human trafficking and measures the effectiveness of our initiatives.

TRAINING

As the first operator in our sector to create bespoke anti-trafficking training for our staff, we constantly look for opportunities to learn from the best practice of others. All our customerfacing and compliance staff receive training from a variety of law enforcement agencies, as well as from specialist charities such as Stop the Traffik and Justice and Care.

We also conduct mutual training exercises with law enforcement agencies, through which we train their officers as to the nature of the support that we can provide to them, while they help our teams understand emerging risks within the sector.

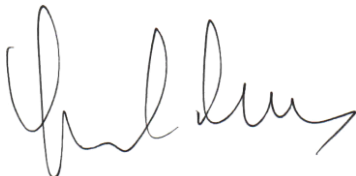
Further information about training can be found within our [Responsible Business policy](#).

Signed:



Director, Digital Ventures Services Limited

Signed:



Director, Digital Ventures Holding Limited

Dated: **24 March 2023**