NAPA Modern Slavery and Human Trafficking Policy

Owner	Finance and Operations Manager	**Approval**	CEO on behalf of the NAPA Trustees
Version	1.0	**Effective date**	30 September 2026
Evaluate	Annual	**Review**	30 September 2029

1. Purpose

NAPA is committed to preventing modern slavery and human trafficking in its operations, partnerships and supply chains.

This policy establishes how NAPA will:

- identify and assess modern-slavery risks;
- recruit and engage people responsibly;
- conduct proportionate supplier due diligence;
- establish safe reporting routes;
- protect potential victims;
- respond to concerns;
- maintain appropriate records;
- determine whether a statutory or voluntary modern-slavery statement should be published.

2. Scope

This policy applies to:

- trustees;
- employees and workers;
- volunteers;
- agency workers;
- consultants and contractors;
- suppliers and subcontractors;
- delivery partners;
- grant recipients where relevant;
- any person acting for or representing NAPA.

It applies to NAPA's own activities and to supply-chain relationships over which NAPA can reasonably exercise influence.

3. Definitions

Modern slavery includes:

- slavery;
- servitude;
- forced or compulsory labour;
- human trafficking;
- debt bondage;
- forced criminality;
- domestic servitude;
- sexual exploitation;
- labour exploitation;
- exploitation of children.

Modern slavery may involve force, coercion, deception, abuse of vulnerability, restriction of movement, threats, withheld documents or wages, or another means of control.

A child may be a victim of trafficking or exploitation even where force or coercion is not established.

4. Commitment

NAPA will not knowingly:

- use forced, trafficked or exploited labour;
- benefit from modern slavery;
- engage a supplier where serious unmanaged concerns exist;
- retaliate against someone who reports a concern;
- conceal evidence of exploitation.

A "zero-tolerance" commitment means NAPA will respond to credible concerns. It does not mean NAPA will automatically terminate every supplier without considering possible harm to workers, remediation and the circumstances.

5. Legal Context and Section 54

Section 54 of the Modern Slavery Act 2015 requires certain commercial organisations supplying goods or services and meeting the statutory turnover threshold, currently £36 million, to publish an annual slavery and human-trafficking statement.

NAPA must assess and document annually:

- whether it meets the statutory definition;
- whether group or subsidiary turnover is relevant;
- whether it carries on a business or part of a business in the UK;

- whether a statement is legally required;
- whether a voluntary statement would nevertheless be beneficial.

NAPA must not state that a document is made under section 54 unless Finance and the Board have confirmed that the provision applies.

Where a statutory statement is required, it must receive appropriate Board approval, be signed by an authorised director and be published in the legally required manner.

6. Governance

The Board retains oversight of modern-slavery risk.

It will:

- approve this policy;
- review significant risks and incidents;
- ensure sufficient resources and competence;
- approve any statutory or voluntary statement;
- oversee significant supplier concerns;
- ensure regulatory reporting where required;
- monitor corrective actions.

7. Modern Slavery Lead

The Modern Slavery Lead is the Chief Executive Officer.

The Lead will:

- coordinate risk assessment;
- advise staff;
- maintain reporting routes;
- support supplier due diligence;
- liaise with safeguarding and whistleblowing leads;
- coordinate incident response;
- maintain records;
- prepare annual assurance for the Board.

8. Responsibilities

Everyone covered by this policy must:

- remain alert to indicators;
- follow recruitment and procurement controls;
- report concerns promptly;
- preserve relevant evidence;
- avoid confronting a suspected exploiter where this could increase risk;
- protect the confidentiality of potential victims;

- cooperate with proportionate enquiries.

Managers and procurement decision-makers have additional responsibility for identifying and managing risks in their areas.

9. Risk Assessment

NAPA will assess modern-slavery risks proportionately, considering:

- sector and service;
- country and region;
- recruitment method;
- use of agency, migrant, temporary or subcontracted labour;
- low pay or excessive working hours;
- complex supply chains;
- high staff turnover;
- accommodation or transport controlled by an employer;
- use of cash or opaque ownership;
- known regulatory or media concerns;
- modern-slavery statements and policies;
- worker voice and grievance mechanisms;
- NAPA's ability to influence the relationship.

Higher-risk categories may include cleaning, hospitality, construction, technology hardware, merchandise, food, transport and outsourced labour, depending on the circumstances.

10. Recruitment and Employment

NAPA will seek to ensure that:

- work is freely chosen;
- workers receive clear written terms;
- identity and right-to-work checks are lawful and proportionate;
- recruitment fees are not charged to workers for obtaining work;
- wages comply with legal requirements;
- deductions are lawful and transparent;
- original identity documents are not improperly retained;
- working hours and rest comply with law;
- workers can leave employment subject to lawful notice;
- bank accounts are in the worker's control;
- concerns can be raised without retaliation.

Right-to-work controls must not result in racial discrimination or assumptions based on nationality, accent or appearance.

11. Volunteers

Volunteering must remain freely undertaken.

NAPA must not:

- require excessive or coercive hours;
- impose unlawful financial penalties;
- retain identity documents;
- use a volunteer label to conceal employment or exploitation;
- prevent a volunteer from leaving;
- make access to essential support conditional on unpaid labour.

Volunteer arrangements will follow NAPA's Volunteer Policy.

12. Procurement and Supplier Due Diligence

Before appointing a material or higher-risk supplier, NAPA may assess:

- legal identity and ownership;
- operational locations;
- workforce and recruitment model;
- subcontracting;
- modern-slavery policies and statements;
- previous incidents or enforcement;
- worker-reporting arrangements;
- audit or certification evidence;
- contract terms;
- response to concerns;
- capacity to improve.

NAPA will not require every supplier to "prove compliance" with section 54 because many suppliers are not legally within its scope. Due diligence will instead examine whether the supplier appropriately manages the risks relevant to its operations.

13. Contractual Controls

Proportionate supplier contracts may require:

- compliance with applicable modern-slavery law;
- prohibition of forced and trafficked labour;
- controls over subcontracting;
- provision of relevant information;
- prompt notification of suspected exploitation;
- cooperation with investigation and remediation;
- worker-protection measures;
- audit or assurance rights;

- corrective-action plans;
- termination for serious or unresolved breach.

Contractual wording alone is not sufficient assurance.

14. Ongoing Monitoring

Higher-risk suppliers may be monitored through:

- periodic questionnaires;
- contract-review meetings;
- supporting evidence;
- staff or worker feedback;
- site visits where appropriate;
- audit reports;
- adverse-information monitoring;
- incident data;
- corrective-action tracking.

Monitoring must be proportionate and avoid creating false assurance.

15. Indicators

Possible indicators include:

- a person appearing frightened or controlled;
- inability to speak without another person present;
- possession of identity documents by someone else;
- restricted movement;
- overcrowded or employer-controlled accommodation;
- excessive working hours;
- withheld or unexplained wages;
- debt to a recruiter or employer;
- threats against the person or their family;
- multiple workers using the same address or bank account;
- lack of suitable clothing or equipment;
- signs of abuse or neglect;
- inconsistent explanations apparently directed by another person;
- a person being transported between work and accommodation under control.

No single indicator proves modern slavery. Concerns must be assessed by appropriately trained people.

16. Reporting a Concern

Concerns should be reported immediately to:

- the Modern Slavery Lead;
- the Designated Safeguarding Lead;
- the Whistleblowing Lead;
- the Chief Executive;
- the Chair of Trustees where a senior leader is implicated.

If someone is in immediate danger, call 999 or 112.

A concern may also be reported to police, the Modern Slavery and Exploitation Helpline, the Gangmasters and Labour Abuse Authority or another competent authority.

The reporter should not investigate independently or confront a suspected exploiter.

17. Responding to a Potential Victim

NAPA will:

- prioritise immediate safety;
- communicate privately where safe;
- use professional interpretation where necessary;
- avoid promises of absolute confidentiality;
- avoid alerting a suspected exploiter;
- record the person's words accurately;
- seek specialist safeguarding or legal advice;
- consider consent and information-sharing requirements;
- refer to appropriate authorities;
- avoid action that could increase danger.

NAPA personnel must not attempt to determine conclusively whether trafficking has occurred.

18. Information Sharing and Consent

Information will be shared on a necessary and proportionate basis.

Consent should normally be sought from an adult with capacity where safe and appropriate. Information may be shared without consent where:

- a child may be at risk;
- another person is at risk;
- there is an immediate threat;
- a serious crime may have occurred;
- the law requires disclosure;
- another lawful safeguarding basis applies.

The reasons for sharing or not sharing must be recorded.

19. Supplier Concerns and Remediation

Where a supplier concern arises, NAPA will consider:

- seriousness and credibility;
- immediate worker safety;
- supplier cooperation;
- whether termination could increase harm;
- need for external referral;
- suspension of new work;
- corrective actions and timescales;
- independent verification;
- contractual rights;
- alternative suppliers;
- lessons for procurement.

Serious or deliberate exploitation will normally justify termination when this can be achieved lawfully and without creating greater risk to affected workers.

20. Non-Retaliation

NAPA prohibits retaliation against anyone who reports or supports a concern in good faith.

This applies to employees, volunteers, suppliers, workers in supply chains and other reporters so far as NAPA can control or influence the relationship.

Retaliation concerns must be escalated immediately.

21. Training

Relevant role-holders will receive training on:

- modern-slavery indicators;
- safe reporting;
- safeguarding;
- recruitment;
- supplier due diligence;
- contract management;
- victim-centred response;
- record-keeping.

Higher-risk procurement and management roles require enhanced training.

22. Records and Data Protection

NAPA will securely retain:

- risk assessments;
- due-diligence records;
- contractual controls;
- reports and referrals;
- investigation and remediation records;
- training;
- Board oversight;
- annual applicability assessments.

Information about potential victims will be restricted and handled in accordance with data-protection and safeguarding requirements.

23. Serious Incidents

NAPA will consider whether a concern requires notification to:

- police;
- safeguarding authorities;
- the Charity Commission;
- OSCR;
- a labour or sector regulator;
- funders;
- insurers;
- another authority.

Trustees retain responsibility for charity serious-incident reporting decisions.

24. Annual Statement

Where NAPA publishes a statutory or voluntary statement, it should accurately describe:

- organisational structure and supply chains;
- policies;
- risk assessment;
- due diligence;
- action taken;
- training;
- effectiveness measures;
- incidents and remediation, where appropriate;
- Board approval and signature.

The statement must not claim that no modern slavery exists unless NAPA has a reasonable basis for that claim.

25. Effectiveness Measures

NAPA may monitor:

- higher-risk suppliers assessed;
- contractual controls implemented;
- staff training completed;
- concerns reported;
- response times;
- corrective actions completed;
- unresolved supplier risks; and
- lessons incorporated into procurement.

A low number of reports is not, by itself, evidence that no risk exists.