

# Papworth Trust Modern Slavery and Human Trafficking

Statement June 2025

## 1. Purpose of this statement

This purpose of this statement is to set out the approach of Papworth Trust to eliminating modern slavery, human trafficking, forced labour and labour rights violations from our business activities and supply chain for the financial year ending March 2026.

It has been reviewed by the Director of People and Culture as per our policy review schedule and was approved by the Board of Trustees and People and Culture Committee in May 2025 and in accordance with the roles and responsibilities set out below.

Under the Modern Slavery Act 2015, an organisation must publish an annual modern slavery statement on its website if it:

- is a commercial organisation that supplies goods or services, and
- carries out its business (or part of its business) in the UK, and
- has a total annual worldwide turnover of £36 million or more

The above criteria do not apply to Papworth Trust. We are not required to publish an annual modern statement, but we choose to do so to demonstrate our commitment to doing all we can to eliminate modern slavery.

## 2. About Papworth Trust

Papworth Trust exists to make a positive difference to the lives of disabled people. We have been doing this for over 108 years and are proud of our history. Our focus is on four key areas – housing, employment, care and day opportunities services, and each of these areas is integral to the wellbeing and needs of disabled people.

### **3. Roles and responsibilities**

At Papworth Trust:

- The Director of People and Culture is responsible for preparing an annual modern slavery statement.
- The Board of Trustees is responsible for approving this statement annually.
- The Director of People and Culture is the designated internal contact for employees who think they have spotted an instance of modern slavery or have a question about modern slavery.

### **4. Definition of 'modern slavery'**

Modern slavery is the severe exploitation of someone for commercial gain. It can include:

- Human trafficking – where someone facilitates or arranges the transport of another person for exploitation.
- Forced labour – where someone is forced to work through coercion (threats).
- Serfdom – where someone is forced to work through coercion and lives on another's property.
- Bonded labour – where someone in poverty borrows money and is forced to work to pay off the debt.
- Descent-based slavery – where slavery is 'passed down' through a family line.
- Forced and early marriage – where someone is married against their will or is too young to consent to the marriage.

### **5. Position Statement**

Papworth Trust are committed to taking proactive steps with the aim of ensuring that this practice does not exist at any level of the organisation.

### **6. Our commitment to the principles of the Modern Slavery Act 2015**

Papworth Trust is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

Here are the steps Papworth Trust has taken and continues to take to understand and minimise the potential risk of modern slavery in our business and supply chains:

## **7. Our policies in relation to the Modern Slavery Act 2015**

As an equal opportunities' employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff and volunteers. We want all our staff and volunteers to feel confident to expose wrongdoing without any risk to themselves.

The following policies are available to all staff and volunteers and can be found on SharePoint and on Lumis learning platform:

### **7a. Code of Conduct**

Papworth Trust Code of Conduct and Staff Handbook makes it clear to employees and volunteers the actions and behaviour expected of them when representing the organisation.

### **7b. Whistleblowing & Public Interest Disclosure Policy**

We encourage employees to use this policy to disclose anything they think counts as whistleblowing.

### **7c. Recruitment and Selection Policy**

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from abuse or coercion.

### **7d. Safeguarding Policy**

Explains how to make a referral should a member of staff have a concern. Modern slavery is referred to in S3 of this policy, which is also shared with contractors, who agree to work to this policy.

## **8. Our supply chain**

We have a broad range of suppliers and, having reviewed our areas of business delivery, those which we deem to be most at risk from modern slavery are providers of agency staff, building, maintenance and cleaning contractors, and IT equipment providers.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

## 9. Due Diligence

We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from them.

We look to source goods and services from organisations, that are reputable and where we can check their suitability.

## 10. Preventing modern slavery

We will ensure that modern slavery does not form part of our business operations by:

- carrying out a risk assessment to identify areas most at risk of modern slavery, and identify measures we can put in place to remove and reduce risks
- where necessary, working with experts to identify steps we can take to reduce the risk of modern slavery

We will ensure that modern slavery does not form part of our supply chain by carrying out due diligence on suppliers before entering into contracts with them, by stating requirements of contractors to take appropriate steps to take all reasonable steps to ensure there is no slavery or human trafficking in their supply chain.

## 11. If there is an instance of modern slavery

### 11.1 Immediate response

If an employee spots any instance of modern slavery, they should report it to the police immediately. If the situation is not an emergency, they can call the police on 101. If there is a risk of immediate danger, they should call 999.

### 11.2 If the instance is within our organisation

If an instance of modern slavery is found within our organisation, senior leaders will be informed immediately, and a senior person appointed to oversee all measures necessary to rectify the situation. Steps needed may include:

- changing processes and policies
- providing more training to all employees
- reporting individuals who have breached the Modern Slavery Act 2015 to the appropriate authority

- where an employee has fallen short of the expectations of this policy, taking action in line with our company capability or disciplinary procedures

### **11.3 If the instance is within our supply chain**

If an instance of modern slavery is found within our supply chain, employees should notify the Director of People and Culture who will decide appropriate action. This may include:

- offering advice to the supplier on steps they can take to eradicate modern slavery
- setting a deadline by which changes must be made
- terminating the contract with the supplier

## **12. Raising concerns**

Employees are encouraged to talk to the Director of People and Culture if they have a question or about modern slavery, or if they are not sure something they have seen counts as modern slavery.

If an employee or volunteer would rather report a concern anonymously, they can do so by:

- Contacting Unseen, the anti-slavery charity also operates a modern slavery helpline can also provide advice. Their number is 08000 121 700. A concern can also be raised online using the Unseen website [File a report](#)

or

- the Trust's external and independent whistleblowing helpline Safecall on 0800 915 1571 or online at [www.safecall.co.uk/report](http://www.safecall.co.uk/report).

## **13. Impact on employees**

An employee will face no negative consequences for:

- alerting the appropriate authority and/or senior leaders to an instance of modern slavery
- raising concerns about our business practices
- seeking advice from an outside party about modern slavery
- asking questions about modern slavery

If an employee feels they have suffered a detriment for any of the above, we encourage them to raise this using our company grievance procedure or our

whistleblowing procedure. More information on these procedures can be found on the Lumis learning platform.

#### **14. Employee training**

The Trust is currently trialling modern slavery e-learning training and will assess by the end of July 2025 if this will be rolled out to the wider organisation.

#### **15. Publishing this statement**

Our modern slavery statement is published on our company website.

A copy can also be requested by email:

[hr.administration@papworthtrust.org.uk](mailto:hr.administration@papworthtrust.org.uk)

#### **16. Document control**

Owner	Director of People and Culture
Consulted	None
Approver	People & Culture Committee
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