

Modern Slavery & Ethical Supply Policy

No Exploitation. Responsible Purchasing. Real Accountability.

Company: Right First Time UK Ltd (No. 17493370) | Updated: 13 October 2026

Status: Voluntary ethical-supply policy; not a statutory section 54 statement.

RFTUK voluntarily applies proportionate ethical-supply standards. This policy is not presented as a statutory Modern Slavery Act section 54 statement.

1. Purpose and coverage

Right First Time UK Ltd (RFTUK) opposes slavery, servitude, forced or compulsory labour, human trafficking, debt bondage, exploitative recruitment and other abusive labour practices. This policy sets out proportionate safeguards in our own operations and in the purchase of goods and services.

It applies to Directors, staff, contractors, Campaign Leaders, Volunteers and others procuring, supplying or managing goods or services for RFTUK. It also guides decisions concerning significant partners, sponsors and donations of goods or services.

2. Company and statutory position

Right First Time UK Ltd is a non-profit company limited by guarantee, registered in England and Wales under company number 17493370. Its incorporation was accepted on 3 October 2026.

This is a voluntary organisational policy, not a statutory slavery and human trafficking statement under section 54 of the Modern Slavery Act 2015. Under the current statutory regime, the annual statement duty generally covers qualifying commercial organisations supplying goods or services, carrying on business in the UK and with turnover of £36 million or more.

RFTUK must reassess whether section 54 applies if its turnover, business activities or the law change. If in scope, it must comply with the applicable statement, approval, signature and website publication requirements rather than treating this document as automatically sufficient.

3. Core standards

RFTUK will not knowingly accept forced labour, trafficking, unlawful child labour, abusive working conditions, coercion, unlawful withholding of wages or documents, violence, harassment or degrading treatment in its activities or supply chains.

Suppliers and contractors are expected to comply with applicable labour, recruitment, minimum wage, working time, health and safety, equality and safeguarding law. RFTUK does not claim that every supplier is free from exploitation simply because it has a written policy.

4. Volunteering, work and fair payment

Volunteering must be genuine and must not be used to disguise an employment relationship or avoid statutory pay rights. Genuine authorised expenses may be reimbursed. Employment, contracting and permitted remuneration must remain lawful and consistent with RFTUK's registered Articles of Association, including their provisions permitting properly recorded payments.

Workers should be free to leave lawful employment subject to legitimate contractual notice; threats, coercive debt and withholding wages or identity papers to prevent departure are unacceptable.

5. Children, recruitment and safe working

RFTUK will not knowingly use or support unlawful or exploitative child labour. Lawful work by young people remains subject to applicable age, education, hours, safety and safeguarding protections.

Significant warning signs include worker-paid recruitment debts, threats based on immigration status, involuntary retention of passports, unsafe accommodation, excessive working hours, threats, intimidation and restrictions on movement. Safe working conditions and access to appropriate complaints routes should be considered in procurement.

6. Supply-chain scope

Our suppliers may include web hosting, cloud and AI services, payment and fundraising platforms, professional advisers, software developers, printers, branded merchandise producers, event venues and catering, travel, marketing, office equipment, security, cleaning, freelancers and subcontractors.

This policy also applies proportionately to services used for the Parent Contribution Service (PCS), including hosting, communications, support and software. PCS is operated by RFTUK Ltd and is not a separate legal entity solely because it uses the PCS name.

7. Risk-based assessment

We assess procurement risk according to the sector, location, type of labour, degree of subcontracting, value and duration of the arrangement, available evidence and credible concerns. Higher-risk purchases receive greater scrutiny; genuinely low-risk purchases should not be burdened with unnecessary paperwork.

Potential higher-risk factors include labour-intensive low-margin services, agency or temporary recruitment, opaque subcontracting, high-risk manufacturing, unexplained low prices, worker-paid recruitment fees and credible adverse findings. Employing migrant workers or people of any nationality is not itself proof of misconduct and must not be used as a discriminatory risk label.

8. Supplier selection and evidence

Before significant or higher-risk purchases, RFTUK should consider available evidence of responsible recruitment, labour standards, supplier oversight and credible remediation. Where a supplier is legally required to publish a section 54 statement, a current statement may be reviewed; its existence is not proof of a slavery-free supply chain.

Smaller suppliers may provide appropriately simple evidence, such as a short labour policy, hiring practices or an explanation of subcontractor controls. We should not insist that a small supplier falsely claims to be subject to section 54.

9. Contracts, agencies and subcontractors

For material or higher-risk contracts, proportionate terms may require legal compliance, reporting of serious concerns, reasonable cooperation, protection against retaliation, appropriate subcontractor oversight and remediation of confirmed failures.

RFTUK must not assert it has inspection or audit powers unless they are actually agreed. Where subcontracting is important, reasonable enquiries may extend beyond the direct supplier. Contract prices and deadlines should not create avoidable pressure for exploitative work.

10. Ethical buying, pricing and donated goods

An exceptionally low price for labour-intensive work may justify questions about lawful pay and working conditions, without being treated as proof of exploitation. RFTUK should avoid unrealistic deadlines, repeated last-minute changes or unreasonable cost transfers to suppliers.

Free services, donations, sponsored goods, pro-bono work and partnership support are not automatically risk-free. RFTUK should make reasonable checks where their value, provenance or circumstances warrant them.

11. Clothing, merchandise, electronics and digital services

Branded clothing, badges and printed campaign materials can involve overseas manufacturing and subcontracting. RFTUK should ask proportionate sourcing questions, especially for significant purchases, and must not make unsupported claims such as “slavery-free” or “fair trade”.

Electronics, technology and outsourced digital work may also have labour risks, including manufacturing, content moderation, data labelling, support centres and logistics. A supplier's well-known brand does not eliminate the need for risk-based assessment.

12. Partners, sponsorship and conflicts

Significant partnerships and sponsorships may require checks for credible labour exploitation concerns. RFTUK must not knowingly provide reputational cover for established abuse or accept an arrangement that undermines its independence.

Procurement, partnerships and response decisions must address relevant financial or personal conflicts, be evidence-led and follow RFTUK's Conflict of Interest and Financial Controls policies.

13. Recognising warning signs

Possible signs include workers appearing controlled or frightened; being unable to leave work or accommodation freely; another person retaining passports; wages withheld without lawful reason; recruitment debt; threats linked to immigration status; cramped accommodation; serious violence or intimidation; or inability to speak privately.

A warning sign is a reason to assess and, where appropriate, report a concern—not a definitive finding that an individual or supplier has committed a crime.

14. Reporting and urgent safeguarding

Anyone concerned about exploitation connected with RFTUK activity should promptly tell an authorised RFTUK safeguarding or governance contact using our Contact Us page. Complaints can also be sent to complaints@rightfirsttimeuk.com. Do not put sensitive victim details into a public forum.

If someone is in immediate danger, call 999. Suspected trafficking or other serious criminal exploitation may require police, safeguarding services or specialist support. Do not confront suspected exploiters or undertake an unsafe private investigation.

15. Victim-centred response and non-retaliation

People affected by exploitation should be treated with dignity and without blame. Safety, confidentiality, informed choice and access to qualified support come before publicity or campaign material. Potential victims must not be pressured to repeat their experience for publicity.

RFTUK will not knowingly tolerate retaliation against someone raising a genuine concern in good faith. An allegation that is not substantiated is not automatically malicious.

16. Assessment, remediation and contract decisions

RFTUK should assess the credibility and urgency of concerns, safeguard affected people, preserve relevant evidence and consider the supplier's response. Depending on the circumstances it may seek more information, pause work, require action, change supplier, end a contract lawfully, or report to appropriate authorities.

Remediation may include repayment of unlawfully withheld wages or recruitment charges, safer recruitment, improved oversight and protection of complainants. Immediate supplier termination may sometimes worsen the position of workers, so consequences should be assessed. Public allegations must have an appropriate evidential and legal basis.

17. Privacy and record keeping

Material supplier checks, identified risks, decisions, approvals and corrective actions should be recorded proportionately and kept securely. Allegations and information about potential victims may involve special-category, criminal-offence or other highly sensitive personal data.

Access must be limited to those with a legitimate need, and retention and disclosure must comply with RFTUK's Data Protection & GDPR, Safeguarding and Information Security policies. Public reporting must not expose identifiable victims or confidential evidence without a lawful basis.

18. Awareness, monitoring and honest reporting

People involved in relevant procurement or safeguarding activities should receive role-appropriate guidance on warning signs and how to raise concerns. RFTUK may monitor significant supplier reviews, concerns, remediation and any relevant training as the organisation grows.

We must not invent compliance figures or imply that no reports means no risk. Public statements should accurately describe steps actually taken, the company's current size and the voluntary nature of this policy.

19. Political independence and public campaigning

Modern-slavery concerns should be considered on evidence rather than party affiliation, nationality or political views. RFTUK may campaign lawfully for better protections, scrutinise policies and support reforms while remaining non-party political under its Articles of Association.

Supplier relationships must not be used to reward or punish lawful political affiliation.

20. PCS and organisational alignment

PCS is a voluntary information, calculation, communication, agreement and record-keeping service run by RFTUK Ltd. Under its current model, it does not itself receive, hold or transfer parent-to-parent maintenance money or exercise statutory enforcement powers.

Suppliers supporting PCS fall within the same risk-based ethical purchasing approach. Payments for RFTUK or PCS suppliers must follow the company's financial controls and the registered Articles.

21. Related policies and review

This policy should be read with RFTUK's Safeguarding, Data Protection & GDPR, Financial Controls & Expenses, Conflict of Interest, Volunteer, Equality & Reasonable Adjustments, Information Security and Complaints policies, and the registered Articles of Association.

It is reviewed at least annually, and sooner after a significant exploitation concern, material supply-chain change, legal development or growth that could bring RFTUK within section 54.

Appendix A — Higher-risk supplier checklist

This practical checklist is a proportionate decision aid, not a guarantee that exploitation cannot occur.

- Goods/services, contract value and reason for higher-risk classification
- Where goods are made or services performed; principal subcontractors
- Agency recruitment, worker-paid fees and treatment of identity documents
- Worker freedom, lawful pay, working conditions and safeguards
- Section 54 statement where the supplier is legally subject to that requirement
- Credible findings or allegations and the supplier's explanation
- Contract controls, remediation requirements and follow-up date
- Decision-maker, approval, any conflict and outcome recorded

Official guidance

- [Modern Slavery Act 2015, section 54](#)
- [GOV.UK: Publish an annual modern slavery statement](#)
- [GOV.UK: Modern slavery statement registry](#)
- [Home Office: Transparency in Supply Chains practical guide](#)

Contact and urgent concerns

<https://rightfirsttimeuk.com/contact-us.php> | complaints@rightfirsttimeuk.com. If someone is in immediate danger, call 999.