PAMODZI CREATIVES
HUMAN TRAFFICKING POLICY DOCUMENT

Updated for 2026 Legislative Compliance

Safeguarding Lead: Roni Edwards-Wilson, CEO
Email: tribe@pamodzicreatives.com
Approved: September 2026
Next Review: September 2027

1. Purpose & Commitment

Pamodzi Creatives CIC is committed to preventing modern slavery, human trafficking, exploitation, and abuse across all areas of our work, including programme delivery, partnerships, and supply chains. We uphold the highest ethical standards and ensure that our practices protect children, adults at risk, and all individuals who may be vulnerable to coercion or exploitation.

This policy outlines our responsibilities under UK legislation and sets out clear procedures for identifying, reporting, and responding to concerns.

This policy applies to:

- Directors
- Delivery Leads
- Advisors
- Freelance staff
- Volunteers
- External partners acting on behalf of Pamodzi Creatives

Pamodzi Creatives promotes an anti-discriminatory, trauma-informed, and safeguarding-centred culture. This policy is reviewed annually or sooner if legislation or organisational practice changes.

2. Legal & Regulatory Framework

Pamodzi Creatives complies with the following legislation and statutory guidance:

- Care Act 2014 (Adults at Risk)
- Modern Slavery Act 2015 (including Section 54: Transparency in Supply Chains)
- Modern Slavery Act Reforms (2025–2026), including mandatory annual reporting and submission to the Government Registry of Modern Slavery Statements
- Children Act 1989 & 2004
- Equality Act 2010
- Working Together to Safeguard Children (2018, updated 2023)
- UK GDPR & Data Protection Act 2018
- Data Use and Access Act 2025 (DUAA)

3. Definitions

Human Trafficking

The recruitment, transportation, transfer, harbouring, or receipt of persons through force, fraud, coercion, or abuse of power for the purpose of exploitation. Exploitation includes:

- Forced labour
- Sexual exploitation
- Domestic servitude
- Forced criminal activity
- Organ trafficking
- Any practice violating human rights

Potentially Vulnerable Person

Includes:

- Children under 18
- Adults at risk as defined by the Care Act 2014
- Any individual who may be subjected to coercion, exploitation, or trafficking

4. Roles & Responsibilities

Designated Safeguarding Lead (DSL): Roni Edwards

The DSL is responsible for:

- Acting on safeguarding and modern slavery concerns
- Reporting concerns to the Police, Local Authority, and National Referral Mechanism (NRM) competent authorities
- Maintaining secure safeguarding records
- Advising staff, volunteers, and partners
- Ensuring training is current and compliant

Mandatory Reporting Duty (2026 Update)

All staff, volunteers, and partners have a **legal duty** to report suspected modern slavery or trafficking to the DSL. The DSL will escalate concerns to the Police, Local Authority, and relevant safeguarding partners in line with updated statutory requirements (2025–2026).

5. Risk Assessment & Due Diligence

Pamodzi Creatives will:

- Conduct safeguarding and exploitation risk assessments for all events and projects
- Undertake due diligence on suppliers, contractors, and partners, including ethical audits
- Include contractual clauses requiring compliance with modern slavery legislation
- Monitor supply chains to identify and mitigate risks

2026 Supply Chain Compliance Update

Pamodzi Creatives maintains documented evidence of due diligence checks and will terminate relationships with suppliers or partners who fail to comply with modern slavery legislation or ethical standards. All suppliers must demonstrate compliance with labour exploitation prevention measures.

6. Code of Conduct

All personnel must:

- Treat all individuals with dignity and respect
- Maintain professional boundaries
- Challenge and report inappropriate behaviour
- Respect privacy and confidentiality within safeguarding limits
- Conduct themselves ethically and lawfully
- Follow all safeguarding and reporting procedures

Personnel must not:

- Use derogatory or discriminatory language
- Engage in inappropriate physical contact
- Meet vulnerable individuals alone without a risk assessment
- Share personal contact details or communicate privately online
- Take photographs without explicit consent
- Consume alcohol or drugs while working

7. Training Requirements

Pamodzi Creatives ensures:

- The DSL holds accredited safeguarding and modern slavery training (renewed every 2 years)
- All staff, volunteers, and partners receive training on:
    - Recognising indicators of trafficking and modern slavery
    - Reporting procedures
    - Whistleblowing protections
    - Safeguarding children and adults at risk

Training is reviewed annually.

8. Reporting & Disclosures

Immediate Danger

If a vulnerable person is at immediate risk:

- Call Police: **999**
- Inform the DSL as soon as possible

Disclosure Guidance

When receiving a disclosure:

- Contact Portsmouth City of Sanctuary or local safeguarding authorities where appropriate
- Listen without interruption
- Stay calm and supportive
- Ask only open questions (e.g., "How did that happen")
- Record exact words, time, date, location, and people present
- Reassure without promising confidentiality
- Report immediately to the DSL

National Referral Mechanism (NRM)

All suspected victims of modern slavery will be referred to the NRM via a competent authority (Police, Local Authority, or Home Office).

2026 NRM Update: Pamodzi Creatives is **not** a First Responder organisation. Where modern slavery is suspected, the DSL will ensure concerns are reported to the Police or Local Authority. Pamodzi Creatives will support individuals through the referral process using trauma-informed practice, ensuring safety, dignity, and access to appropriate support services.

9. Allegations Against Staff or Partners

Any allegation involving a staff member, volunteer, or partner that may indicate risk of harm must be:

- Reported immediately to the DSL
- Referred to statutory authorities, including local safeguarding boards
- Investigated according to best practice

Low-level concerns will also be recorded and monitored.

10. Data Protection

All safeguarding and trafficking records are:

- Stored securely with restricted access
- Retained in line with UK GDPR and organisational policy
- Shared only with lawful authorities
- Used solely for safeguarding purposes

Records relating to children and adults will be retained until at least age 25 or longer if required.

2026 DUAA Update

Safeguarding data requests will be responded to within **one month**. Where requests are complex or clarification is required, Pamodzi Creatives may pause ("stop the clock") while further information is sought. Individuals may raise complaints about data handling directly with Pamodzi Creatives, and we will acknowledge complaints within **30 days**.

11. Whistleblowing & Complaints

Pamodzi Creatives encourages an open, transparent culture. Concerns may be raised with:

- The DSL
- Directors
- Police or local safeguarding authorities
- NSPCC Whistleblowing Helpline

2026 DUAA Complaints Requirement

Pamodzi Creatives follows the updated DUAA 2025 requirement to provide an internal complaints route before escalation to external regulators. All complaints will be acknowledged within 30 days and handled confidentially.

12. Monitoring & Review

Protections under the Public Interest Disclosure Act 1998 apply. Complaints will be treated confidentially and taken seriously.

This policy is reviewed annually by Directors, the DSL, and Delivery Leads, and updated sooner if legislation or guidance changes.

Approval

PAMODZI CREATIVES
HUMAN TRAFFICKING POLICY DOCUMENT

Approved by :

Alison Lee
Governance and Compliance Director

Signed By :

Roni Edwards-Wilson
CEO

Signature: 

Date: September 2026

Next Review: September 2027