

# Modern Slavery & Human Trafficking Statement 2026

CAP 2592

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# 1 Modern Slavery & Human Trafficking Statement

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This statement shows how the Civil Aviation Authority (CAA) and its wholly owned subsidiaries obtains assurance that slavery and human trafficking are not taking place in its supply chain and its own business. References to “we”, “us”, “our” and “CAA” are to all of these companies.

The Modern Slavery Act 2015 (the “Act”) came into force in 2015 and we publish our modern slavery and human trafficking statement on our website and to the Home Office central government register.

We will not tolerate slavery or human trafficking in our business or within its supply chains. We are committed to improving our policies and practices to play our part in tackling Modern Slavery.

This statement builds on previous annual statements published regarding the activity undertaken to assess the potential risks in our supply chain.

## 2 Our Role

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We are a public corporation established by Parliament in 1972 and now constituted under the Civil Aviation Act 1982 (as amended). Our functions are set out in legislation, including the Civil Aviation Act 1982, the Aviation Security Act 1982, the Airports Act 1986, the Transport Act 2000, the Civil Aviation Act 2012, the 2018 Space Industry Act, the UK Basic Regulation, and secondary legislation made under those Acts, such as the Air Navigation Order and Implementing Regulations.

The CAA is not part of HM Government or the Crown, and as a statutory corporation it has legal independence.

As the United Kingdom's independent aviation and aerospace regulator, the CAA's main statutory functions are to:

- regulate civil aviation and airspace safety: licensing of airports, aerodromes, pilots, air traffic controllers, aircraft maintenance engineers and commercial UAV operators, licensing and certifying the design, maintenance and repair of aircraft;
- approve sub-orbital rockets and orbital rockets launched from the UK and satellites launched by UK companies;
- advise and assist the Secretary of State on all civil aviation matters, including policy and airspace change decisions for the use of UK airspace so as to meet the needs of all users, having regard for national security, economic and environmental factors and the UK international obligations, while maintaining a high standard of safety, including at airports;
- be the economic regulator of those airports with significant market power and of the provision of certain air traffic services;
- be a concurrent competition powers regulator with the Competition and Markets Authority to use their respective powers to achieve more competitive outcomes in the air traffic and airport operation sectors for the benefit of consumers;
- license airlines, including assuring their financial fitness;
- license air travel organisations;
- enforce general consumer protection law, such as the requirements covering denied boarding and persons with reduced mobility; and
- advise and assist the Secretary of State in relation to the regulation of aviation security and enforcing requirements.

The CAA has two subsidiaries:

- Air Safety Support International Ltd (“ASSI”), a not-for-profit organisation, which provides a cohesive system of civil aviation safety and security regulation in the UK’s Overseas Territories; and
- CAA International Ltd (“CAAI”), the CAA commercial subsidiary, which provides technical advice and training to Civil Aviation Authorities and aviation industry worldwide, as well as examinations for pilots.

## Funding of CAA

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CAA’s operating costs are primarily recovered from those it regulates by way of Schemes of Charges, which set out, for each of the regulatory functions, charges that are to be paid to CAA.

The CAA also receives Government grant funding for the delivery of specific projects or programmes of work.

For more information about what we do and how we do it, please see [our website](#).

## Organisational structure

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The Secretary of State for Transport is the sponsor of CAA. The CAA employs over 1,700 full-time equivalent employees located primarily in the UK.

For more information about the CAA’s structure and governance arrangements, please see our [Corporate Governance Statements \(CAP2552\)](#).

## 3 Modern Slavery & Human Trafficking

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### Supply Chain

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For FY25/26, the CAA had 652 active suppliers and managed around 541 contracts centrally procured by the Procurement Team.

We typically buy a wide range of professional and consultancy services and limited level of physical goods. A small proportion of our expenditure is transactional and relatively low value and managed via Purchase Orders. For larger spend (e.g. over business case level of £75k), longer-term commitments or higher risk, contracts are used. Where we engage suppliers, the CAA will undertake necessary due diligence checks, the nature of these will depend on the goods or service being purchased. However, these checks may involve, but are not limited to: credit checks, evidence of corporate certifications, a modern slavery questionnaire for relevant procurements, technical information and customer references.

Approximately, 93% of our suppliers are UK based. Some suppliers we use involve second and third-tier supply chains. Whilst visibility regarding those second and third-tier suppliers is limited, where appropriate, we will incorporate Modern Slavery contractual conditions into the primary supplier's contract, which will flow through its reciprocal arrangements with a supplier's own supply chain.

We are taking a proportionate and risk-based approach to the management of Modern Slavery within our supply chain by focusing on industries or professions where slavery could be most prevalent (e.g. provision of manual labour). We continue to work closely with key suppliers where risk may be higher, such as facilities management services.

Where appropriate, we use Government approved routes to support sourcing and procurement activities.

### Policies

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#### People Policy

From an internal operations perspective, we have several organisation-wide People policies which are the formal rules and guidelines covering key aspects including but not limited to; recruitment and employee life cycle management, work processes, staff and workplace conduct in respect to values and behaviours. These policies support trust, fairness, and inclusivity to enable and sustain a safe working environment for staff.

Modern slavery and human trafficking awareness is embedded into our annual mandatory Ethics e-learning package, which is required training for all employees. This ensures that staff understand the risks, recognise the signs, and know the procedures for raising concerns in line with our ethical standards.

Colleagues can raise concerns they may have regarding the CAA's activities anonymously via the organisation's Internal Confidential Reporting mechanism. The CAA's Executive Committee and Board receive updates on the volume of reports received through this route and details of the themes raised so that, where necessary, appropriate action can be taken.

In addition, we work collaboratively with our recognised trade unions and have an internal Employee Forum which meets regularly to discuss employee-related activities.

## **Procurement Policy**

Whilst CAA is categorised as operating within the Public Sector, our financial funding model is unique in the fact that we are funded from charges levied on aviation industry to perform regulatory services. That said, we recognise our responsibility to ensure that procurement activity is managed in accordance with all legislative requirements whilst aligned to Central Government best practice and guidance, including adherence to Managing Public Money.

We have a Procurement Policy, which was approved by the CAA's Executive Committee in February 2025 that clearly sets out CAA's approach to managing spend in a fair and transparent manner that balances quality, cost and commercial risk.

## **Terms and Conditions**

Where appropriate, we will use our own sets of standard terms and conditions for contracting purposes. As standard, each set of terms has a requirement for suppliers to comply with all application laws, statutes and regulations, which must be reciprocated in any supplier third party contracts.

On the occasions where our terms and conditions are not used, we will either use central government terms (such as Government Commercial Agency) or the supplier's. In the event we contract upon a supplier's terms, we will undertake sufficient due diligence of terms to ensure the relevant clauses are included from a legislative and commercial risk perspective.

## **Contract Management**

Each contract let by us has a business owner. Where appropriate, each contract will be let with a minimum set of supplier performance controls and measures. For contracts of medium to high risk or value, a member of our Procurement Team will actively support the business area in the management of supplier performance.

## **Risk assessment and management**

A significant proportion of the CAA's contracts are for the provision of consultancy and professional services. Therefore, we believe risk of modern slavery and human trafficking practices occurring is extremely low. However, we remain focused on identifying any

potential risks, and managing any occurrences of modern slavery should such issues arise.

We remain committed to monitoring our supply chain and applying Modern Slavery best practice approach into our procurement processes. We will continue to adapt and modify our approach in line with relevant central Government guidance. The CAA also participates in a forum with other regulators to share procurement expertise and best practice.

The CAA's Internal Audit function plans to undertake a review of the CAA's procurement and contract management arrangements introduced following the implementation of the Procurement Act 2023, together with activities continuing under the Public Contracts Regulations 2015, to ensure they are appropriately designed and operating effectively across the full procurement lifecycle. Although Modern Slavery is not a specific focus for this activity, wider supply chain risks are in scope.

## **Progress since last year**

The Procurement Act 2023 (PA23), which came into effect in February 2025, introduced significant reforms aimed at enhancing transparency, accountability, and ethical standards across public procurement processes. These reforms seek to ensure greater compliance with statutory obligations and promote responsible sourcing practices. From a contracting perspective, CAA has not engaged in contracts for services that fall within the Modern Slavery scope; our expenditure remains primarily focused on consultancy and professional services.

In preparation for the Act, the core Procurement Team has completed the mandatory government training for PA23 through the Government Commercial College, with several team members also undertaking extended practitioner-level training. In addition, the CAA has completed the required onboarding activities for the Central Digital Platform and developed new PA23 procurement documentation.

The core team continues to engage with a range of external information sources, including the Cabinet Office public procurement notices, Government Commercial College, and industry webinars, to ensure information and knowledge remains current with both PA23 and other relevant legislation (e.g. Modern Slavery).

The introduction of the new procurement regulations has created a transitional period during which procurements initiated and awarded under the Public Contracts Regulations 2015 (PCR 2015) will continue to be managed alongside new requirements arising after February 2025, which will be governed by the Procurement Act 2023. It is anticipated that this transitional period will continue for at least a further three (3) years, until all contracts awarded under PCR 2015 have either expired or been retendered.

Our Procurement team has been officially designated as a second line<sup>1</sup>, responsible for overseeing the organisation's procurement risk appetite and risk policy to ensure robust governance and continuous risk mitigation.

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<sup>1</sup> In this context, "second line" refers to functions that provide oversight, guidance, and support to help manage risk and ensure compliance within the [Three Lines Model](#). When procurement operates as a second line, it plays a key role in setting standards, conducting due diligence, and monitoring suppliers to help prevent and address risks such as modern slavery within the supply chain.

## 4 Approval

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We are making this statement on a voluntary basis in form set out in section 54 of the Modern Slavery Act 2015.

This statement was approved by CAA's Board of Directors on 16 September 2026 and has been signed by CAA's General Counsel and Company Secretary on behalf of the Board.

**Signed:**

**Jonathan Spence**

General Counsel & Company  
Secretary,

16 September  
2026