



July 2025

Anti-Slavery & Human Trafficking Policy

Version Control

Version	Date	Changes Made	Reviewed By
1.0	28 Jul 2025	Initial policy created	Head of Compliance

1. Policy Statement

e-Careers has a zero-tolerance approach to all forms of modern slavery, human trafficking, forced or compulsory labour, servitude, or child labour.

We are committed to conducting business ethically and with integrity and to ensuring that slavery and human trafficking are not present anywhere in our operations or supply chain.

2. Scope & Application

This policy applies to:

- **All employees**, temporary workers, contractors, consultants, trainees, and apprentices
- **All business partners**, including suppliers, vendors, outsourcing providers, placement employers, and subcontractors
- All **programmes delivered** by e-Careers via online, classroom, work placement, and corporate channels
- All subsidiaries trading under www.e-careers.com

3. Legal & Regulatory Framework

This policy aligns with:

- Modern Slavery Act 2015 (UK) and Transparency in Supply Chains requirements
- Anti-Slavery Day Act 2010
- Equality Act 2010, Data Protection Act 2018, UK GDPR
- Industry standards, including ISO/BS 25700 for modern slavery risk governance

4. Our Commitments

We will:

- **Act ethically** in all dealings, ensuring fair and respectful treatment of individuals (

- **Maintain transparency**, including annually reviewing our operations and supply chains
- **Train staff** on modern slavery awareness, including induction and refresher content
- **Conduct due diligence**, risk-assessing suppliers and asking them to commit to equivalent standards
- **Monitor compliance** as part of supplier contracts, audits, and procurement procedures
- **Investigate and respond** to any concerns or reports of slavery or trafficking

5. Responsibilities

Senior Leadership Team

- Approve the policy and ensure sufficient resources for implementation
- Review and sign off the annual Modern Slavery Statement

Compliance & Procurement Team

- Conduct supplier due diligence audits
- Review contracts to include modern slavery prohibitions
- Track supply chain risk using risk registers

People & Administration Team

- Provide appropriate training to all new and existing staff
- Maintain accurate employment records

All Staff, Volunteers & Partners

- Must complete modern slavery awareness training
- Must immediately report any concerns or suspicions

6. Supply Chain Due Diligence

- Key suppliers may be asked to demonstrate:
 - Ethical pay and working conditions
 - Freedom of employment
 - Transparent recruitment practices
- High-risk suppliers will be subject to regular evaluation

7. Reporting & Grievance Mechanisms

Any concerns or suspicions of slavery or trafficking should be reported via:

- safeguarding@e-careers.com or via our weblink at <https://safeguarding.e-careers.com/>
- In-person to a DSL or deputy

Reports will be investigated confidentially, and individuals raising concerns in good faith will not be penalised.

8. Investigation & Remedial Action

Upon any credible allegation:

- a. A risk assessment is made
- b. Appropriate remedial actions taken (e.g. supplier review, termination of contract)
- c. Incidents are logged and escalated to leadership
- d. Support is provided to affected individuals where relevant

9. Monitoring & Review

- **Annual review** of modern slavery risks, training effectiveness, and policy compliance
- **Board review** of annual Modern Slavery Statement under Section 54 of the Modern Slavery Act
- Updates made more frequently if regulation or business risk changes

10. Transparency & Annual Disclosure

Under UK law, companies above a £36m threshold must publish an annual Modern Slavery Statement. While e-Careers may not meet that threshold, we voluntarily commit to:

- Publishing our Modern Slavery Statement on our website
- Reporting on steps taken, training delivered, supply chain risk assessment and improvements made

11. Contact Information

For any concerns, disclosures, or requests for advice, please use the following contact information:

- **Name:** Neil Gosal
- **Role:** Safeguarding Lead & Head of Compliance
- **Phone Number:** 020 3198 7556
- **Email:** neil.g@e-careers.com or safeguarding@e-careers.com
- **Weblink:** <https://safeguarding.e-careers.com/>